BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	))))	Order No. 202-26-20

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 25A
Schahfer CCR Part A Demonstration
Addendum
Part 1

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

Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-Fired Boilers by a Date Certain - Addendum 2

Pursuant to 40 CFR Part 257.103(f)(2)

Submitted to:

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August 2022

NiSource continues to advance efforts under the Your Energy, Your Future initiative a holistic, customer-centric strategic priority aimed at identifying and driving decarbonization pathways that meets the needs of both people and the environment. NiSource's environmental and sustainability performance, include the following goals:

- ✓ 100% coal-free generation mix by 2026-2028
- ✓ 90% reduction of scope 1 greenhouse gas emissions by 2030, with a 58% reduction already accomplished
- ✓ 50% reduction in methane emissions from main and service lines by 2025, with a 42% reduction already accomplished
- ✓ 99% reduction in air emissions (nitrogen oxides, sulfur dioxide, mercury), by 2030
- ✓ 99% reduction in water withdrawals by 2030

NIPSCO - Leaving things better – YOUR ENERGY, YOUR FUTURE

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1.0 INTRODUCTION

Northern Indiana Public Service Company LLC (NIPSCO) submitted the Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-Fired Boilers by a Date Certain (hereinafter Demonstration) to the United States Environmental Protection Agency (EPA) on October 30, 2020. The Demonstration was prepared by Golder Associates USA Inc., *a member of WSP* (Golder) in collaboration with and on behalf of NIPSCO for the R. M. Schahfer Generating Station, Wheatfield, Indiana (RMSGS, Figure 1) to meet the requirements of 40 CFR § 257.103(f)(2). Due to a lack of alternative disposal options on- and off-Site for the high-volume waste streams generated by RMSGS, the Demonstration substantiates the basis for continued receipt and management of coal combustion residuals (CCR) and/or non-CCR influent in the Waste Disposal Area (WDA, Figure 2). The WDA is the only currently available management option on- and off-Site for several (e.g., currently up to 4.1 million gallons per day) influent waste streams until coal-fired generation and production of the residual CCR and non-CCR wastes related to typical power plant operation, shutdown, and closure processes end. Furthermore, the Demonstration outlines an alternative closure schedule for RMSGS' single remaining operational CCR surface impoundment beyond the otherwise mandatory April 11, 2021, cease receipt and initiate closure deadline.

Following an informal review of the October 2020 Demonstration and November 23, 2020 discussions with EPA Headquarters representatives about their interpretation of 40 CFR § 257.103(f)(2) regulatory requirements and their expectations regarding Demonstration content, Golder/NIPSCO prepared and on November 30, 2020 NIPSCO submitted the Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-Fired Boilers by a Date Certain - Addendum 1 (hereinafter Demonstration Addendum 1). In accordance with EPA Headquarters feedback, Demonstration Addendum 1 provides additional CCR Rule groundwater monitoring and corrective action information for other RMSGS CCR Rule regulated management units besides the WDA, updated the existing closure plan, and offered greater detail in an enhanced WDA closure schedule.

Both the Demonstration and Demonstration Addendum 1 anticipated a permanent cessation of coal-fired generation and the initiation of post-operational waste generation and management activities in May 2023. The scheduled cessation of generation was predicated on two key assumptions. First, operating until then would meet existing grid reliability-related electricity supply needs in accordance with the requirements of and commitments to the Midcontinent Independent System Operator (MISO). Second, the schedule of NIPSCO's transition from primarily coal-fired to renewable generation capacity would be sufficient to meet ongoing NIPSCO and MISO electricity demands. However, and as discussed in greater detail in Section 1.2, after preparation of the Demonstration and Demonstration Addendum #1, events outside the control of MISO and NIPSCO occurred. These unforeseen conditions require continued RMSGS coal-fired generation until December 31, 2025. By extension, the cessation of discharge to and initiation of closure of the WDA will follow in approximately six more months. Accordingly, and in accordance with discussions during April-May 2022 between representatives of EPA Headquarters and NIPSCO, on behalf of NIPSCO, Golder has prepared a second Addendum to the Demonstration.

This Demonstration of Site-Specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-Fired Boilers by a Date Certain - Addendum 2 (Demonstration Addendum 2), provides the new date of permanent cessation of coal-fired boilers at the RMSGS and NIPSCO's continued commitment to cease operation and complete closure the WDA no later than October 17, 2028, as stipulated in 257.103(f)(2)(iv)(B). Furthermore, to meet the requirements of 40 CFR § 257.103(f)(2), Demonstration Addendum 2 supplies information updated since November 2020 (i.e., the date Demonstration Addendum 1 was prepared)

with respect to groundwater monitoring and corrective action activities at RMSGS. Specifically, in accordance with 40 CFR §257.103(f)(2) and the August 28, 2020, preamble to the proposed rulemaking, Demonstration Addendum 2 in concert with the Demonstration and Demonstration Addendum 1:

- address all applicable Part A regulatory requirements
- demonstrate that qualifying criteria had been met
- justifies the new cessation of coal-fired boiler operations date, and
- provides the following updated information:
  - a recent re-evaluation of alternative disposal capacity options and availability
  - progress toward closure since November 30, 2020
  - WDA-specific and other RMSGS CCR management units' geologic/hydrogeologic groundwater monitoring compliance data
  - closure plan schedule as required by 40 CFR §257.102(b) and a narrative with justification for a new cease receipt of waste and amended WDA closure activities timeframe, and
  - NIPSCO recertification of RMSGS facility wide CCR Rule compliance

As explained and justified herein, cessation of coal-fired generation at RMSGS will now be December 31, 2025, providing nearly three years to a) complete boiler shutdown processes, some of which are expected to generate significant volumes of CCR and non-CCR waste streams, b) reduce and/or eliminate other ongoing influent streams, c) optimize the closure plan and gain regulatory agency approval for the WDA closure approach, and d) complete closure construction. Following cease receipt of WDA waste streams (Q2 2026), NIPSCO estimates a timeframe of approximately two and a half years to achieve final closure of the WDA including the professional engineer's certification, thereby achieving final closure by September 17, 2028, and meeting the 40 CFR § 257.103(f)(2) deadline of October 17, 2028.

This Demonstration Addendum 2 in combination with remaining applicable sections of the Demonstration (Golder, October 2020) and Demonstration Addendum 1 (Golder, November 2020) meet the requirements of 40 CFR § 257.103(f)(2).

1.1 Background

NIPSCO had been planning for a no later than 2023 retirement of all four coal units (Units 14, 15, 17, 18) at the Schahfer generating station. NIPSCO's preferred resource plan pointed to the retirement of the coal units at the Schahfer Generating Station and the development and completion of a portfolio of renewable wind and solar projects to replace the energy and capacity needs that the station provides NIPSCO and its customers. NIPSCO conducts an Integrate Resource Plan (IRP) every three years to outline the roadmap for future energy needs over the next 20 years. The completion of three wind projects along with a number of transmission system upgrades allowed NIPSCO to retire Units 14 and 15 in 2021, almost 2 years earlier than the planned 2023 retirement. Any delays to the construction progress of the renewable projects significantly impact NIPSCO's ability to sufficiently meet resource adequacy obligations and reliably serve customers. Therefore, NIPSCO must continue to operate RMSGS until the end of 2025 when permanent shutdown of coal-fired electricity generation is scheduled. Until shutdown, RMSGS' ongoing coal-fired generation and associated waste stream management activities are, in turn, dependent upon continued operation of the WDA. Consistent with the objective to reduce its reliance on multiple unlined surface impoundments for waste stream management, NIPSCO is currently in the procurement

(i.e., bid and contractor selection) process, a key initial stage in closure of the Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and Drying Area (collectively monitored and referred to as the Multi-Cell Unit (MCU)). As a precursor step in advance of the mandatory April 11, 2021, cease receipt date, NIPSCO ceased discharging influent to these impoundments by October 31, 2020, leaving only the WDA as the remaining operational CCR surface impoundment.

Until Q2 2026 and as shown on the coal-fired cessation, boiler shutdown and impoundment closure timeline, (see Sections 1.4 and 2.4, and Figure 3), the Demonstration, Demonstration Addendum 1, and Demonstration Addendum 2 substantiate the need for receipt and management of CCR and/or non-CCR waste streams by the WDA due to a lack of alternative disposal options on- and off-Site.

In anticipation of and in planning for the reduction of influent waste streams to the WDA and final closure by September 17, 2028, NIPSCO has or is currently engaging in several activities, including:

- The wastewater piping re-direct project was completed in October 2020, resulting in cessation of waste stream discharges to the MCU. CCR waste streams were redirected to the WDA and non-CCR waste streams were redirected to other on-Site waste management units
- A 2019-20 detailed assessment of WDA solids (i.e., ash) content including the presence and type of CCR, relative thickness, and location/extent, the results of which were summarized in a report prepared to support closure design initiatives
- Preparation of and negotiations regarding a beneficial reuse permitting application is ongoing with Indiana Department of Environmental Management (IDEM). Approval of the permit application would allow NIPSCO to excavate and beneficially reuse 250,000 cubic yards or more of WDA bottom ash as a) a protective layer above the landfill geomembrane composite liner and, b) as a landfill final cover drainage layer, instead of virgin natural resources (i.e., native sand) from off-Site. If approved, the amount of remaining material in the WDA would be significantly less, allowing for a faster closure by removal timeframe
- Cessation of coal-fired generation and completion of boiler shutdown/decommissioning activities, and thus, permanent elimination of those directly produced and resulting waste streams by the end of Q2 2026
- Completion of closure activities for the MCU by Q4 2025 and, as part of this action, elimination of CCR-impacted dewatering streams as influent to the WDA by Q2 2026, and
- Conceptual planning for a second wastewater piping re-direct project which would eliminate current (or remaining post-generation) boiler room sump and yard drain stormwater flows to the WDA by the end of Q2 2026

1.2 NIPSCO's Role in Midcontinent Independent System Operations and NIPSCO's Generation Transition Plan

NIPSCO, as a member of MISO, has resource adequacy obligations to MISO, of which RMSGS is a critical element of how NIPSCO meets these obligations. MISO is an Independent System Operator (ISO) or Regional Transmission Organization (RTO) ensuring the reliable delivery of electricity in the United States and Canada to 42 million consumers. ISOs and RTOs are organizations formed with the approval of the Federal Energy Regulatory Commission (FERC) to coordinate, control, and monitor the use of the electric transmission system by utilities, generators, and marketers. ISOs and RTOs operating in North America manage the systems that serve two-thirds of the customers in the U.S. and over half the population of Canada. MISO approved NIPSCO's plan to

retire RMSGS in 2023 but that was only one step in a highly complex process to enable the retirement and replacement of generation assets. On the state regulatory front, NIPSCO secured Indiana Utility Regulatory Commission (IURC) approval in December 2019 of an electric base rate case, to support its generation strategy, with new depreciation schedules related to the early retirement of coal-fired generation. In addition, NIPSCO is also executing on a number of required transmission system upgrades that need to be completed prior to the retirement of RMSGS.

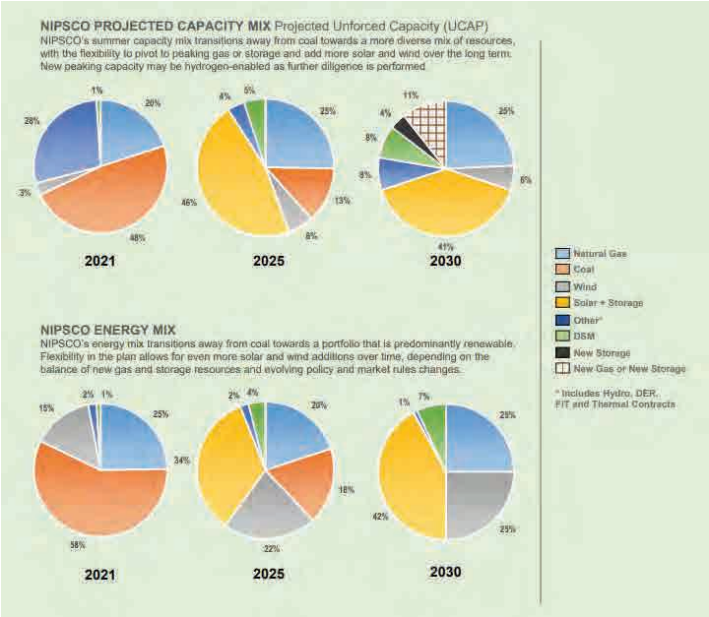
1.2.1 Background On NIPSCO's Generation Transition

As a public utility in the state of Indiana, NIPSCO conducts an Integrated Resource Plan, known as an IRP, every three years to outline the roadmap for future energy needs over the next 20 years. Analysis in 2016 and 2018 demonstrated that considering maintenance, environmental compliance, and economic pressures facing the coal generating portfolio, coal unit retirement was the most compelling economic alternative for customers. Furthermore, the analysis pointed to a portfolio of primarily renewable resources (wind, solar and solar plus storage) as being the most economic alternative for customers with estimated savings of $4B as compared to maintaining the existing coal fleet and will drive a 90% reduction in CO2 emissions by 2030 (based on 2005 levels).[1]

Accordingly, NIPSCO's generation transition strategy called for the retirement of the coal fleet over a ten-year period, starting with the retirement of the Schahfer coal units in 2023 and Michigan City Unit 12 in 2028. In order to replace the capacity at Schahfer, NIPSCO has acquired a mix renewable wind and solar projects through a combination of NIPSCO ownership (JVs with Tax Equity Partners) and Power Purchase Agreements (PPAs).

NIPSCO has been planning for a no later than 2023 retirement of all four coal units (Units 14, 15, 17, 18) at the Schahfer generating station. The completion of three wind projects along with a number of transmission system upgrades allowed NIPSCO to retire Units 14 and 15 in 2021, almost 2 years earlier than the planned 2023 retirement. The retirement of the remaining coal units at the Schahfer Generating Station is contingent on the development and completion of the remaining portfolio of renewable projects to replace the energy and capacity of Units 17 and 18. By 2025, the NIPSCO portfolio is expected to transition from coal dominant portfolio to a solar dominant portfolio with over 46% of its capacity coming from solar resources and providing 34% of its customers energy requirements.

[1] NIPSCO has sold in the past, and in the future may sell, the Renewable Energy Credits from its renewable generation to a third party because this helps keep our energy more affordable for our customers.



1.2.2 Maintaining System Reliability

As noted above, NIPSCO participates within the MISO market. MISO is responsible for coordinating the reliable operation of the energy system in collaboration with the various market participants. One of the ways it effectuates this responsibility is by ensuring there are enough capacity resources plus contingency reserves to meet customers energy needs at all times. For NIPSCO, part of its Resource Adequacy obligation to MISO is that it has capacity resources and reserves to cover its own customer's annual peak demand plus reserves. Currently, this must be demonstrated to MISO annually. Furthermore, as a vertically integrated utility, NIPSCO is also required by rules and statute in Indiana to have capacity resources to economically and reliably serve its customer's energy needs.

With a 2025 retirement of the RMSGS coal units, solar resources will become one of the primary ways in which NIPSCO will meet its capacity and reliability obligations to MISO and reliably serve its customers.

1.2.3 Solar Supply Chain Issues

There are a range of external factors creating uncertainty around the availability of key input material necessary to place solar projects in-service in the US. Currently, these key issues are:

- Department of Commerce (DOC) Investigation into antidumping and countervailing duties anti circumvention petition filed by a domestic solar manufacturer
- Uyghur Forced Labor Prevention Act and Forced Labor Withhold Release Order
- Section 201 Tariffs, and
- General global supply chain and labor availability issues

The issue of most significance is the decision from the U.S. DOC announcing that it will move forward with an investigation into the petition filed by a domestic solar manufacturer. The combination of the DOC investigation and the other issues virtually eliminated solar panel imports and other key components required to build solar

projects in the U.S. starting in March 2022. A significant number of solar projects have been delayed or canceled.[2] As NIPSCO is in the midst of a transition to a solar dominant portfolio, its projects are not immune to the effects of these issues. There is currently uncertainty around the timing of completion for NIPSCO's planned portfolio of projects. NIPSCO has received several notices of potential Force Majeure from developers in connection with solar panel availability, thus project delays are anticipated. The uncertainty surrounding the completion timing of the renewable projects created the potential risk that NIPSCO would not have the resources available to meet its capacity/energy obligations.

1.2.4 The Antidumping and Countervailing Duties Anti Circumvention Petition And DOC Investigation

On February 8, 2022, Auxin Solar Inc., a domestic manufacturer of solar modules, filed a petition requesting that the DOC initiate a circumvention investigation into whether imports of certain parts and components imported from Cambodia, Malaysia, Thailand, or Vietnam are circumventing antidumping and countervailing duty orders from China. On March 25, 2022, the DOC announced it would move forward with a circumvention investigation that could have wide ranging effects on the companies that import or rely on solar imports in the United States. For context, the countries subject to the investigation accounted for more than 85% of U.S. solar panel imports in the fourth quarter of 2021.

If the DOC issues an affirmative preliminary circumvention determination, importers will be required to pay antidumping and countervailing duties (tariffs) on certain parts and components that entered the U.S. on or after March 31, 2022. The amounts of tariffs being contemplated under the petition range from 19% to 525%. Regulations require the DOC to issue a preliminary determination by August 29, 2022, and a final determination by January 19, 2023.

It is important to note that the tariffs determinations will be based on individual manufacturers and the countries where the panels are manufactured, therefore should tariffs be imposed as result of this investigation, the impact will have to be assessed on a project-by-project basis. This could create further uncertainty on the timeline based on the individual circumstances of each project.

On June 6th, 2022, President Biden took Executive Action with the focus on spurring domestic solar production, including a 24-month suspension of anti-circumvention tariffs on modules, invoking the Defense Production Act to accelerate the production of clean energy technologies, eliminating back-dated tariffs, and employing federal procurement to increase domestic manufacturing. The Executive Action and 24-month tariff suspension are a positive development as they provide some level of certainty regarding in-flight solar projects. However, they do not fully mitigate the project delays and supply chain and labor issues facing solar project development. Solar panel imports essentially ceased in March 2022 at the onset of the DOC investigation, and it will take some time for imports to recover to previous levels.

1.2.5 Implications for NIPSCO Capacity Position and MISO Obligations

The high level of uncertainty surrounding the supply of solar panels and timely completion of the renewables projects creates a significant risk for NIPSCO to reliably meet its capacity/energy obligations for MISO and our customers. Any delays to the completion dates of the anticipated portfolio of solar projects will impact NIPSCO's

[2] Utility Dive, "Supply-chain squeeze: Solar, storage industries grapple with delays, price spikes as demand continues to grow," March 31, 2022, https://www.utilitydive.com/news/solar-storage-delays-price-supplychain/620537/.

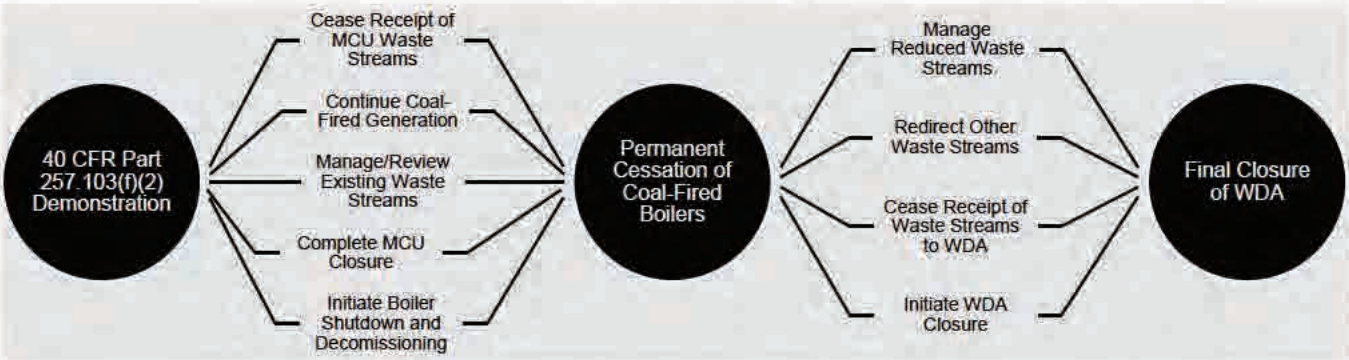
capacity position and its ability to meet its Resource Adequacy obligations to MISO. This challenge becomes acute should the remaining coal units at RMSGS (Units 17 and 18) retire as originally anticipated in May 2023.

NIPSCO is moving forward with two solar projects already under construction – Dunns Bridge I and Indiana Crossroads Solar (INCR) – and extending the operating life of RMSGS Units 17 and 18 to close the capacity gap to a more manageable level, which could then be addressed through a combination of other mitigations.

1.3 Planned Cessation of Operations

In 2020 MISO approved NIPSCO's plan to retire RMSGS in 2023; however, increasing regional electric demand, decreasing non-renewable production capacity, and unforeseen regulatory and supply chain issues which are delaying production-critical renewable generation projects have impacted MISO's previous assumptions. This, in turn, requires that RMSGS's coal-fired retirement be delayed until the end of 2025. As summarized in the embedded figure below, waste generation activities, individually and collectively, impact and require continued use of the WDA, the Site's only remaining active CCR Rule-regulated surface impoundment, for the next several years. The embedded figure below summarizes the planned reduction of influent waste stream activities to achieve cessation of the coal-fired boilers and permanent closure of the WDA.

Planned Cessation of WDA Operations



In the Demonstration and an annual progress report completed in October 2021 and considered in Demonstration Addendum 2, NIPSCO/Golder identified and evaluated discharge flows into the WDA on a waste stream-specific basis for on- and off-Site treatment and disposal alternatives. Future annual progress reports will be produced following the same waste stream-by-waste stream basis. Most of these discharge flows are high in volume yet based on sampling of ash and the saturated zone within the WDA, confirmed to be low in relative contaminant loading (i.e., concentrations of 40 CFR § 257 Appendix III and IV constituents). As a practical matter, reduction, or permanent elimination of waste streams, particularly those of significant volume, will be NIPSCO's primary focus, corresponding largely with cessation of coal-fired generation and completion of boiler shutdown activities. Initiated in October 2021, NIPSCO achieved significant reductions in influent volume (cessation of Units 14 and 15) and by the end of Q2 2026, will ultimately eliminate waste stream discharges to the WDA.

These and related activities with specific focus on the WDA are discussed in Section 2.4 and depicted on the facility closure timeline provided therein (Figure 3).

1.4 Demonstration Approach and Contents

The approach to and preparation of the Demonstration, Demonstration Addendum 1, and Demonstration Addendum 2 are based on the final CCR Rule Part A regulations as found in 40 CFR § 257.103(f)(2). The Demonstration and Addenda have been prepared to address all applicable regulatory requirements, demonstrate that qualifying criteria have been met, and provide an evaluation of alternative disposal capacity options and availability, a risk mitigation plan for continued operation, facility-wide CCR compliance certification, WDA-specific groundwater monitoring compliance data, and a 30% design closure plan with narrative.

Following this Introduction, Section 2.0 summarizes key information about the WDA including:

- overview of CCR and non-CCR wastes managed by the WDA, including source and flow volume tabulated on a waste stream-specific basis and depicted on a facility water flow diagram
- high-level summary of the historical and current CCR groundwater monitoring programs, including current CCR Rule monitoring phase, and
- description of the sequence of cessation of coal-fired generation, boiler shutdown activities, reduction/elimination of all waste streams into the CCR Unit, and planned closure, including a Gantt chart that depicts key actions and milestones (Figure 3)

Section 3.0 provides an identification and evaluation of existing alternative disposal options for influent into the WDA.

Section 4.0 addresses the continued operation risk mitigation plan, which remains largely unchanged since the submittal of the Demonstration in October 2020.

Section 5.0 provides information relative to CCR Rule regulatory compliance, with emphasis on groundwater monitoring and response requirements, including:

- recertification of RMSGS' compliance with all applicable 40 CFR § 257.60-107 requirements, signed by an authorized representative of NIPSCO
- figure showing groundwater monitoring well locations in relation to the CCR Units
- well construction diagrams and drilling logs for monitoring wells installed since 2020
- potentiometric surface maps characterizing the direction of groundwater flow accounting for seasonal variations
- tabulated groundwater monitoring data for each monitoring well for each CCR Rule monitoring event
- corrective measures assessment required in accordance with 40 CFR § 257.96
- progress reports on remedy selection and design and the report of final remedy selection required at 40 CFR § 257.97(a)
- most recent structural stability assessment performed pursuant to 40 CFR § 257.73(d), and
- most recent safety factor assessment performed pursuant to 40 CFR § 257.73(e)

Section 6.0 provides the current closure plan, a narrative that explains and justifies the date by which RMSGS will cease receipt into the WDA in order to meet the Q2 2026 closure construction start schedule date and construction completion date of September 17, 2028, design plans, and a timeline of key milestones and planned activities occurring between the development of WDA Final Closure Construction Plans (Q2 2024) and Closure Certification (Q3 2028).

Section 7.0 discusses the owner/operator compliance responsibilities NIPSCO LLC will fulfill subsequent to the Demonstration's submission to EPA and Section 8.0 provides the attestation of Golder, the preparer of the Demonstration, as to its accuracy and conclusions regarding the availability of no alternative disposal capacity, followed by Section 9.0 which provides references used in the preparation of the document. Supporting tables, figures, and appendices follow the Demonstration text.

2.0 DESCRIPTION OF CCR UNIT

This section of the Demonstration provides unit-specific details about the WDA including an explanation and summary of the source, type, and volumes of waste streams managed in the WDA; an overview of the CCR Rule-required groundwater monitoring well network and monitoring phases; and a discussion of key activities related to reduction of influent and other actions to be taken prior to cessation of waste receipt and final closure.

2.1 Overview of Waste Streams Managed

As noted, the WDA receives both CCR and non-CCR waste streams. At the time of this Demonstration, NIPSCO provided waste stream data including point source category descriptions (40 CFR § 423.11), a Facility Water Flow Diagram, and estimated average daily flows. This information was reviewed and updated for the purposes of the October 2021 annual progress report and preparation of Demonstration Addendum 2. The point source categories (RMSGS color-coding) and associated RMSGS designations for the waste streams managed at the WDA include:

- Low Volume Waste pursuant to 40 CFR § 423.11(b)
  - Unit 14 Boiler Room Sump (Non-CCR)
  - Unit 15 Boiler Room Sump (Non-CCR)
  - Yard Drain (Non-CCR)
- Flue Gas Desulfurization (FGD) Wastewater pursuant to 40 CFR § 423.11(n)
  - Unit 17/18 FGD Filter Building North Sump (CCR)
  - Unit 17/18 FGD Filter Building South Sump (CCR)
- Ash Transport Water pursuant to 40 CFR § 423.11(p)
  - Unit 17 Bottom Ash Sluice (CCR)
  - Unit 18 Bottom Ash Sluice (CCR)
- Combustion Residual Leachate pursuant to 40 CFR § 423.11(r)
  - MCU Closure Dewatering (CCR)[3]

[3] Development of the closure plan for the Multi-Cell Unit (MCU, [Material Storage Runoff Basin, Metal Cleaning Waste Basin, and Drying Area]), estimates that dewatering activities will generate a waste stream of approximately 1.42 MGD for a duration of approximately six months.

The waste stream from Units 14 and 15 Boiler Room Sumps include boiler drains and some other service water systems collected in the 14 or 15 sumps inside the main building. These waste streams are pumped through sump pumps to the WDA. The Yard Drain waste stream is from an outdoor sump that collects outdoor drainage water, as well as some water that comes from the Unit 14 boiler and some other service systems. This waste stream is pumped through sump pumps to the WDA. The waste stream from 17/18 FGD Filter Building North/South Sumps includes wastewater and slurry from the FGD process that cannot be filtered. This waste stream is pumped through either the North or South sump pumps inside FGD to the WDA. These waste streams were redirected to the WDA as part of the MCU wastewater piping re-direct project and in anticipation of closure of the MCU. The waste stream from Units 17 and 18 Bottom Ash Sluice includes bottom ash (or slag) that must be removed from the bottom holding tank of the boiler. Service water is used as a sluicing medium to transport the ash from the holding tank (bottom ash hopper), through pumps inside the main building to the WDA.

In addition to the above streams, NIPSCO's MCU closure application, which is currently undergoing IDEM review, includes the removal of interstitial water (i.e., dewatering) and discharge of this project specific CCR waste stream to the WDA. The selected remedial contractor may use well points or other dewatering equipment to extract the interstitial water, allowing excavation of the ash from within the MCU. The water may be pumped into the abandoned Unit 15 sluice line that runs parallel and to the west of the MCU and discharges in the northwest corner of the WDA. Dewatering and discharge to the WDA in compliance with the facility's NPDES permit is currently scheduled to begin in Q4 2023 and be required for virtually the duration of the closure project.

Following cessation of coal-fired generation, requisite Units 14, 15, 17, and 18 boiler decommissioning activities are expected to also generate Unit-specific washdown streams of approximately 3.5 to 5.0 million gallons per Unit, per decommissioning event. Given the existing RMSGS wastewater piping layout, discharge of these streams will be directed to the WDA prior to its cease receipt date and initiation of closure construction activities.

Based on the data provided by NIPSCO LLC, the embedded table below summarizes the estimated average daily flows managed during normal operation of the WDA until cessation of the coal-fired boilers. At the time of preparation of this Demonstration Addendum 2 the measurable reduction in Site-wide generation of CCR and non-CCR waste streams resulting from boiler shutdowns of Units 14 and 15 could not be definitively quantified due to the absence of flow metering capacity in individual feed and discharge lines. However, in determination of alternative capacity and reliance for the operation of the WDA, the combined estimated average daily waste stream flow of 5.04 MGD reported in the Demonstration (i.e., October 2020) from Units 14 and 15, has been removed from the combined total waste stream flow considered in this Demonstration Addendum. Note that such an approach assumes an instantaneous and maximum waste stream flow reduction (and does not account for the compulsory boiler washdown flow from Units' decommissioning) and is, as a result, considered a conservative compacity demand-based approach to this update. Therefore, due to ongoing Site operations and maintenance activities (e.g., boiler room sump dewatering for both shut down and active Units, stormwater collection and management), volumes of individual CCR and non-CCR effluent being discharged to the WDA are estimated to be between 0.34 MGD and 1.42 MGD, with a combined estimated daily flow of 4.1 MGD. At this time, the washdown generated waste streams are only projections based on NIPSCO LLC's experience performing similar activities and are, therefore, not included in the combined waste stream summary.

WDA Managed Waste Stream Flows

Description	Estimated Average Daily Flow (MGD)	Category
Unit 14 Boiler Room Sump Cessation 10/2021	~~2.88~~	Non-CCR
Unit 15 Boiler Room Sump Cessation 10/2021	~~2.16~~	Non-CCR
Yard Drain	0.86	Non-CCR
Unit 17/18 FGD Filter Building North Sump	0.55	CCR
Unit 17/18 FGD Filter Building South Sump	0.55	CCR
Unit 17 Bottom Ash Sluice	0.34	CCR
Unit 18 Bottom Ash Sluice	0.34	CCR
Combined Sub-Total Waste Steam	**2.64**	
MCU Closure Dewatering	1.42	CCR
Combined Total Waste Steam	**4.06**	

2.2 CCR Rule Groundwater Monitoring

Starting in 2016, following the installation of a groundwater monitoring system certified by a qualified professional engineer to be consistent with the design and construction requirements of 40 CFR § 257.91, and throughout calendar year 2017, Golder collected background groundwater samples and performed Detection Monitoring around the WDA pursuant to the requirements of 40 CFR § 257.94. The monitoring system initially consisted of two background and six downgradient monitoring wells. In 2018, Golder performed the first and second Assessment Monitoring sampling events pursuant to the requirements of 40 CFR § 257.95, following which, ten additional downgradient monitoring wells (including six monitoring wells on the property boundary) were installed. In 2019, consistent with evolution of the Conceptual Site Model (CSM), nine additional downgradient monitoring wells (including five additional monitoring wells on the property boundary) were installed. In 2020, two additional background monitoring wells were installed on the southern property boundary. Based upon groundwater monitoring results collected pursuant to the CCR Rule to date, corrective measures program requirements are neither required nor have they been implemented at this CCR Unit. The current monitoring well network is summarized in the embedded table below and shown on Figure 4.

Well Installation Purpose	Well ID
Background Monitoring Wells	GAMW03, GAMW03B, GAMW-68, and GAMW-68B
Downgradient Monitoring Wells	GAMW01, GAMW01B, GAMW12, GAMW12B, GAMW13, GAMW13B, GAMW14, and GAMW14B

Well Installation Purpose	Well ID
Assessment Monitoring Wells	GAMW51, GAMW51B, GAMW59, GAMW59B, GAMW60, and GAMW60B
Property Boundary Wells	GAMW42, GAMW42B, GAMW42C, GAMW43, GAMW43B, GAMW44, GAMW44B, GAMW57, GAMW57B, GAMW58, and GAMW58B

2.3 Cessation of Operation and Closure

Because of the design and operation of the generating station and as a result of other compliance-driven projects completed ahead of the CCR Rule Part A revisions, virtually all remaining flows into the WDA are high-volume waste streams, limiting available alternatives for their management prior to cessation of coal-fired generation by the end of Q4 2025. Reduction in current waste stream inflows, cease receipt of all influent, and initiation of closure of the WDA are linked inextricably to several other major activities being undertaken as elements of RMSGS' ongoing closure and decommissioning plans including, but not limited to:

- Permanent cessation of all coal-fired generation and, thus, permanent elimination of those directly produced waste streams
- completion of boiler shutdown/decommissioning activities and, following such, permanent elimination of the resulting waste streams
- redirect of other non-CCR waste streams, and
- dewatering and closure of other CCR surface impoundments in accordance with IDEM approvals

NIPSCO will reduce influent into the WDA and the need for management on- or off-Site due to the Q4 2025 permanent elimination of high-volume waste streams following the cessation of coal-fired generation and the closure of the MCU, also scheduled to be completed no later than Q4 2025. Following the cessation of coal-fired generation, NIPSCO will systematically implement a final boiler shutdown and washdown process, which will potentially produce both CCR and non-CCR waste streams on a boiler-by-boiler basis. As each boiler is shut down and cleaned prior to demolition, these waste streams (washdown streams referenced in Section 2.2) will also be permanently eliminated as influents to the WDA.

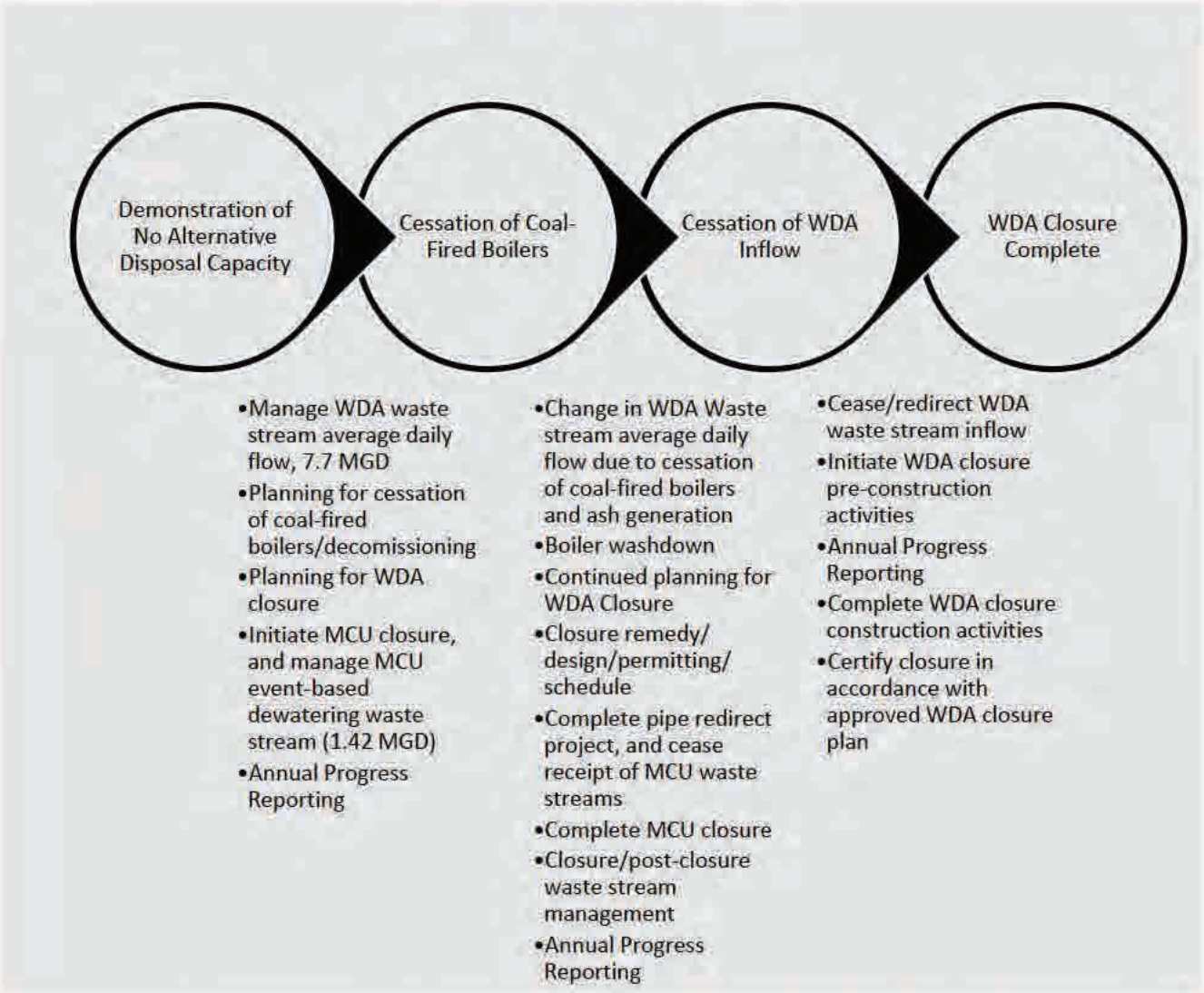
Initiated in October 2021 NIPSCO achieved significant reductions in influent volume (cessation of Units 14 and 15) and current waste materials inventory, and by the end of Q2 2026 ultimately eliminate discharges to the WDA by completing the following actions:

- Late 2021 through 2022 – shutdown, cleaning, and washdown of the former boilers and ancillary equipment in anticipation of plant demolition, permanently eliminating these waste streams
- 2023 (pending acceptance by IDEM) – contingent upon regulatory approval of a CCR beneficial reuse proposal, NIPSCO will begin to permanently remove 250,000 cubic yards or more of bottom ash currently in the WDA, substituting it for virgin materials as a geomembrane liner protectant and drainage underlayment in the final cover system for the on-Site landfill

- Late 2025 – redirect other non-CCR waste steams to other surface impoundments, permanently eliminating these waste streams
- Late 2025 – completion of dewatering activities associated with the MCU closure and permanent elimination of this waste stream
- End 2025 – cessation of coal-fired generation, followed by permanent elimination of bottom ash and sluice water waste streams, and
- Early 2026 – shutdown, cleaning, and washdown of the former boilers and ancillary equipment in anticipation of plant demolition, permanently eliminating these waste streams

The following schematic of operation and closure activities outlines the process NIPSCO will follow to decrease reliance on the WDA, achieve systematic reduction/elimination of influent waste streams, and complete final closure of the CCR Unit by September 17, 2028. A detailed timeline for these concurrent and sequential activities is presented in the embedded figure below.

Operation and Closure Activities



3.0 EVALUATION OF ALTERNATIVE DISPOSAL CAPACITY, 257.103(f)(2)(v)(A)

40 CFR §257.103(f)(2) outlines specific conditions that must be met to qualify for continued operation and alternative deadlines to initiate closure of the WDA, without consideration of increase in costs or inconvenience to NIPSCO. Pursuant to 40 CFR §257.103(f)(2)(v)(A) the options considered to evaluate the availability of existing alternative disposal capacity for CCR and non-CCR waste streams both on and off-site that are currently managed in the WDA are documented in the Demonstration and the Part A Demonstration Annual Progress Report #01-21 (Golder 2021, Appendix A). The Annual Progress Report, which documents a continued lack of alternative capacity both on-Site and off-Site, was certified by a professional engineer in October 2021. The next Annual Progress Report will be completed and similarly certified in October 2022.

4.0 CONTINUED OPERATION RISK MITIGATION PLAN, 257.103(f)(2)(v)(B)

In the event a release from the WDA is detected in groundwater during continued operation of the CCR Unit, 40 CFR § 257.103(f)(2)(v)(B) requires a plan to expedite and maintain the containment of any contaminant plume generated by the release. The Demonstration described the risk mitigation plan in detail. There have been no changes to the risk mitigation plan since the submittal of the Demonstration in October 2020. In short, the risk mitigation plan includes use of the existing downgradient Detection Monitoring and Assessment Monitoring wells to extract groundwater and contain the plume on a temporary basis with the discharge being directed back into the WDA. This initial response is intended only as a temporary method to contain the plume generated by the release until the release can be more fully assessed and a full-scale pump-and-treat system could be designed and constructed as needed. The full-scale pump-and-treat system would be constructed to contain the release and would consist of newly installed extraction wells, following which the extracted groundwater would be pumped to a new treatment facility located to the northwest of the WDA. Treatment technologies selected and other design parameters would be established based on the COC(s) requiring a response action.

5.0 CCR RULE REGULATORY COMPLIANCE, 257.103(f)(2)(v)(C)

This section of the Demonstration Addendum 2 provides description and documentation of all 40 CFR §257 requirements completed since the submittal of the Demonstration in October 2020 and Demonstration Addendum 1 in November 2020.

5.1 Certification of Facility Status

In accordance with 40 CFR §257.103(f)(2)(iii), this section of the Demonstration Addendum 2 substantiates compliance with all other applicable requirements of 40 CFR §257. RMSGS includes three waste management areas subject to CCR Rule regulation (see Figure 2), two of which NIPSCO will continue to operate for the foreseeable future and one of which is slated for closure in the near term. These include the WDA, which is the primary focus of this Demonstration; Landfill Phases V, VI, and VII; and the Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and Drying Area (DA), collectively the Multi-Cell Unit (MCU).

On October 30, 2020 NIPSCO certified that the entire facility complies with the applicable requirements of the CCR Rule (Appendix D of the 2020 Demonstration). NIPSCO has completed a recertification indicating that the entire facility still complies with the applicable requirements of the CCR Rule (Appendix B). Since October 2020, the following additional independent certifications have been completed by a qualified professional engineer in accordance with the content and schedule requirements of the CCR Rule:

- Periodic inspection report §257.83(b)(2) and §257.84(b)(2) (only applicable to the WDA and the Landfill)
- Groundwater system certifications §257.91(f) (applicable to all CCR Units)
- Assessment of corrective measures addendum §257.96(a) (only applicable to the MCU)
- ASDs for the Landfill Phases V and VI, Detection Monitoring §257.94(e)(2), and the WDA, Assessment Monitoring §257.95(c)(3)

5.1.1 Monitoring System Design

Since the submittal of the Demonstration and Demonstration Addendum, Golder installed an additional well pair (GAMW68 and GAMW68B) south of the WDA and three additional piezometers designated GAMW65B, GAMW66B, and GAMW67B to the north of the existing groundwater network. These piezometers were installed to further assess groundwater flow direction northwest of the WDA. No changes were made to the monitoring well

networks of the MCU or Landfill Phases V, VI, and VII. In 2022, Golder on behalf of NIPSCO, prepared the Groundwater Monitoring System Design Manual Revision 4.0 (GMSDM Revision 4, Golder 2022) to provide recently discovered historical information regarding the role and construction of the slurry trench cores and their impacts on hydraulic conditions at the Site. The report reaffirms Golder's understanding of the appropriate design and construction of the groundwater monitoring system based on this recently discovered historical information. Based on the GMSDM Revision 4, NIPSCO's professional engineer, recertified the groundwater monitoring systems in May 2022 (Appendix C). A summary of the well networks for all three CCR Units is provided below.

WDA	
Background Monitoring Wells	GAMW03, GAMW03B, GAMW68, and GAMW68B
Downgradient Monitoring Wells	GAMW01, GAMW01B, GAMW12, GAMW12B, GAMW13, GAMW13B, GAMW14, and GAMW14B
Assessment Monitoring Wells	GAMW42, GAMW42B, GAMW42C, GAMW43, GAMW43B, GAMW44, GAMW44B, GAMW51, GAMW51B, GAMW57, GAMW57B, GAMW58, GAMW58B, GAMW59, GAMW59B, GAMW60, and GAMW60B
Piezometers (non-CCR Monitoring Wells)	GAMW02, GAMW05, GAMW65B, GAMW66B, and GAMW67

Drying Area, MSRB, MCWB (i.e., MCU)	
Background Monitoring Wells	GAMW04, GAMW07, GAMW07B, GAMW15, and GAMW15B
Downgradient Monitoring Wells	GAMW08, GAMW08B, GAMW09, GAMW09B, GAMW16R, GAMW16BR, GAMW17, GAMW17B, GAMW17B, GAMW18, and GAMW18B
Assessment Monitoring Wells	GAMW46, GAMW46B, GAMW52, GAMW52B, GAMW53, GAMW53B, GAMW54, GAMW54B, GAMW55R, GAMW55B, GAMW56, and GAMW56B
Piezometers (non-CCR Monitoring Wells)	GAMW06, GAMW63B, and GAMW64B

Landfill Phases V, VI, and VII	
Background Monitoring Well	GAMW20, GAMW24, GAMW24B, GAMW25, and GAMW25B
Downgradient Monitoring Well	GAMW26, GAMW26B, GAMW27, GAMW27B, GAMW38, GAMW38B, GAMW39, GAMW39B, GAMW40, GAMW40B, GAMW41, GAMW41B
Piezometers (non-CCR Monitoring Wells)	MW-1S/1D, MW-2S/2D, WM-3S/3D, MW-4S/4D, MW-5S/5D, MW-6S/6D, MW-7S/7D, MW-8S/8D, MW-9S/9D, MW-10S/10D, MW-11S/11D, MW-12S/12D, MW-13S/13D, MW-14S/14D, GAMW10, GAMW11, GAPIEZ07, GAMW20B, GAMW29/29B, GAMW30/30B, GAMW31/31B, GAMW32/32B, GAMW33/33B, GAMW34/34B, GAMW35B, GAMW36/36B, GAMW37B, GAMW48/48B, GAMW49/49B, GAMW50/50B

A summary of the well construction information is provided in Table 1 and a summary of the dates and purpose of installation is provided in Table 2. The additional boring and well construction logs are provided in Appendix D. The monitoring well locations are shown in Figure 4.

5.2 Groundwater Monitoring Results

Starting in July 2016 on behalf of NIPSCO, in accordance with the requirements of the CCR Rule Golder has performed monitoring of each well in the CCR groundwater monitoring network on at least a semi-annual basis. The monitoring well network is described above in Section 5.1.1 and shown in Figure 4. A compilation of all groundwater data collected as part of the CCR program since October 2020 is provided in Appendix E. The most recent annual reports (2021 Annual Report, submitted January 2021) for the WDA, MCU, and Landfill Phases V, VI, and VII are provided in Appendix F.

5.2.1 WDA Monitoring Program Status

As reported in the Demonstration, background groundwater samples were collected between July 2016 and August 2017, as required by 40 CFR §257.94. Golder collected the first Detection Monitoring groundwater samples in October 2017 and identified statistically significant increases (SSIs). Based on these results, NIPSCO established an Assessment Monitoring program in January 2018.

Golder performed the first Assessment Monitoring event in March 2018. The results from the first five Assessment Monitoring events were reported in the Demonstration. Golder performed the fifth Assessment Monitoring event in April/May 2020 and the statistical analysis in September 2020 and concluded that the only constituents demonstrating an apparent statistically significant level (SSL) are molybdenum and lithium in GAMW51B. A summary of the groundwater protection standards (GWPS) is provided in Table 3. The results of the April/May 2020 sampling event are similar to historical data. Golder recertified the previously submitted alternative source demonstration (ASD) in December 2020 (Appendix G).

Golder performed the sixth Assessment Monitoring event in October 2020 and the statistical evaluation in February 2021 and identified SSLs for molybdenum and lithium in well GAMW51B and molybdenum in GAMW-60B. As described in the Demonstration, GAMW60B was installed downgradient of GAMW51/51B in 2019 to further assess the nature and extent of groundwater quality further downgradient of the WDA. The October 2020 Assessment Monitoring event was the fourth round of sampling at this location, and therefore, was the first event for which SSLs were calculated. As these results are consistent with the primary lines of evidence presented in the June 2020 ASD, this ASD was recertified in May 2021 (Appendix H).

Golder performed the seventh Assessment Monitoring event in April 2021 and the statistical evaluation of the resulting data in August 2021 and identified SSLs for molybdenum and lithium in well GAMW51B and molybdenum in GAMW60B. As these results were consistent with the previous Assessment Monitoring event, the ASD was recertified November 2021 (Appendix I). Golder performed the eighth Assessment Monitoring event in September 2021 and the statistical evaluation in January 2022 and again identified SSLs for molybdenum and lithium in well GAMW51B and molybdenum in GAMW60B. As these results were consistent with the previous Assessment Monitoring event, the ASD was recertified April 2022 (Appendix J). Golder performed the ninth Assessment Monitoring event in April/May 2022 and is currently awaiting receipt of data from the analytical laboratory.

A summary of the dates and purposes of each monitoring event is presented in Table 4 and a complete compilation of all analytical data is provided in Appendix E.

5.2.2 MCU Monitoring Program Status

As reported in the Demonstration Addendum 1, background groundwater samples were collected between July 2016 and August 2017, as required by 40 CFR §257.94. Golder collected the first Detection Monitoring groundwater samples in October 2017 and identified SSIs. Based on these results, NIPSCO established an Assessment Monitoring program in January 2018.

Golder performed the first Assessment Monitoring event in March 2018 and completed the Assessment of Corrective Measures (ACM) in 2019 (see Section 5.3). The results from the first five Assessment Monitoring events were reported in the Demonstration. Golder performed the fifth Assessment Monitoring event in April/May 2020 and the statistical analysis in September 2020 and the results confirmed the SSL for cobalt at GAMW08. A summary of the GWPS is provided in Table 3. Golder performed the sixth Assessment Monitoring event in October 2020 and the statistical analysis in February 2021. Golder performed the seventh Assessment Monitoring event in April 2021 and the statistical analysis in August 2021. Golder performed the eighth Assessment Monitoring event in September/October 2021 and the statistical analysis in January 2022. The results of the sixth, seventh, and eighth Assessment Monitoring events confirmed the SSL for cobalt in GAMW08. Golder performed the ninth Assessment Monitoring event in April/May 2022 and are currently awaiting receipt of data from the analytical laboratory.

A summary of the dates and purposes of each monitoring event is presented in Table 4 and a complete compilation of all analytical data is provided in Appendix E.

5.2.3 Landfill Monitoring Program Status

As reported in the Demonstration Addendum 1, background groundwater samples were collected between July 2016 and August 2017, as required by 40 CFR §257.94. Golder collected the first Detection Monitoring groundwater samples in October 2017 and identified SSIs. Golder identified a potential alternative source that could explain the SSIs and prepared an ASD. A qualified Indiana-licensed professional engineer certified the ASD in April 2018. The ASD supports the findings that the SSIs determined in January 2018 do not result from a release from the CCR Unit. The key supporting lines of evidence described in the ASD indicate that the closed, non-CCR Rule regulated phases of the landfill (i.e., Phases I and II) are the source of the SSIs. Therefore, no further action (i.e., Assessment Monitoring) is warranted, and Phases V and VI will remain in Detection Monitoring. The results from the first seven Detection Monitoring events were reported in the Demonstration Addendum 1. Golder performed the seventh Detection Monitoring event in September 2020 and recertified the ASD in March 2021 (Appendix K).

Golder performed the eighth and nineth Detection Monitoring events in April and September 2021. Consistent with the previous evaluations, Golder identified a potential alternative source that explained the SSIs. The ASD was recertified in October 2021 (Appendix L) and March 2022 (Appendix M). Golder performed the ninth Assessment Monitoring event in April/May 2022 and are currently awaiting receipt of data from the analytical laboratory.

A summary of the dates and purposes of each monitoring event is presented in Table 4 and a complete compilation of all analytical data is provided in Appendix E.

5.3 Corrective Measures Assessment

Based upon groundwater monitoring results collected pursuant to the CCR Rule to date, NIPSCO is only currently required to complete an Assessment of Corrective Measures (ACM) for the MCU. The ACM was completed and posted to the NIPSCO's CCR Website in 2019. The first Addendum to the ACM was completed in November

2020. Both the ACM and the ACM Addendum were included in the Demonstration Addendum 1. A second ACM Addendum was completed in July 2021. The ACM Addendum #2 incorporates an enhanced final cap design in all corrective measure alternatives. The certified ACM Addendum #2 is included in Appendix N. A third ACM Addendum was completed in March 2022. The ACM Addendum #3 includes ACM revisions in response to site conditions, evolving state regulatory agency (i.e., IDEM) requests/requirements, and changing Federal (i.e., EPA) regulation and policy interpretations. The ACM Addendum #3 further refines remedial alternatives based on the single cobalt SSL. The certified ACM Addendum #3 is included in Appendix O. Neither the WDA, which is in Assessment Monitoring being performed consistent with 40 CFR §257.95, nor the Landfill, which remains in Detection Monitoring pursuant to 40 CFR §257.94, is subject to the ACM requirement.

5.4 Remedy Selection

Based upon groundwater monitoring results collected pursuant to the CCR Rule to date, NIPSCO is currently required to complete remedy selection requirements pursuant to 40 CFR §257.97 or 257.98 for only the MCU. Neither the WDA, which is in Assessment Monitoring being performed consistent with 40 CFR §257.95, nor the Landfill, which remains in Detection Monitoring pursuant to 40 CFR §257.94, is subject to the remedy selection requirement.

NIPSCO is currently performing a more detailed evaluation and comparison of the four potential groundwater corrective measures identified in the ACM Addendum #3. That detailed evaluation includes the development of conceptual designs and preparation of engineering cost estimates for each of the potential groundwater corrective measures. On August 3, 2022 NIPSCO received notification of IDEM's approval of the MCU closure application. NIPSCO is now in the early stages of a public comment period and is awaiting substantive public comments on the draft IDEM approval. Following final approval by IDEM on the proposed closure approach, with which the groundwater corrective measure must be aligned, NIPSCO will select a groundwater remedy. In the interim, Golder will continue the remedy evaluation process, will schedule a public meeting on groundwater corrective measure(s), and will complete semi-annual progress reports. The semi-annual progress reports completed since the submittal of the Demonstration Addendum 1 are included in Appendix P.

5.5 Structural Stability Assessment

Golder completed the initial Structural Stability and Safety Factor Assessment for the WDA in October 2016 as required by 40 CFR §257.73(d) and 40 CFR §257.73(e) (Appendix L of the Demonstration). The most recent certified annual inspection report (Annual RCRA CCR Unit Inspection Report Waste Disposal Area - Surface Impoundment, December 2021) is attached in Appendix Q. As required by 40 CFR §257.83(b)(1), the WDA has been visually inspected annually for structural stability. This assessment concludes that based on information provided by NIPSCO and on Golder's on-site visual inspection, the overall condition of the WDA is acceptable. The assessment was certified by a qualified professional engineer licensed in the State of Indiana on December 31, 2021. Neither the MCU nor the Landfill are subject to the structural stability assessment requirements (40 CFR §257.73(d)).

5.6 Safety Factor Assessment

Golder completed the initial Structural Stability and Safety Factor Assessment for the WDA in October 2016 as required by 40 CFR §257.83(b)(1). The Safety Factor Assessment is provided in Appendix L of the Demonstration and was certified by a qualified professional engineer licensed in the State of Indiana on October 5, 2016. Neither the MCU nor the Landfill are subject to the safety factor assessment requirement (40 CFR §257.73(e)).

6.0 CLOSURE PLAN, 257.103(f)(2)(v)(D)

As discussed in Sections 1.4 and 2.4 above, NIPSCO has outlined a planned cessation of operation and closure plan for the Site. The current reliance on the WDA is tied to the ongoing generating activities and dewatering and closure of other CCR surface impoundments with a period of sequential cessation of waste streams from Q1 2021 until Q2 2026. Cessation of coal-fired generation is scheduled by the end of Q4 2025 and closure of the MCU is also scheduled to be completed no later than Q4 2025, reducing the reliance on the WDA due to the elimination of these waste streams. Following the cessation of coal-fired generation, NIPSCO will systematically shut down the boilers, which will produce an action-specific need for the WDA due to cessation washdown streams forecasted until Q2 2026. Identification and redirection of other waste streams, currently forecasted between Q4 2025 and Q2 of 2026, will be completed prior to final cease receipt of WDA streams (Q2 2026). WDA closure construction is scheduled to begin in Q2 2026 and will be completed prior to October 17, 2028.

On the behalf of NIPSCO, Golder completed a CCR Closure Plan Update (Version #5) which addresses the requirements of 40 CFR §257.102(b) *Criteria for conducting the closure or retrofit of CCR units*. The plan describes the WDA CCR Unit, and provides a closure remedy, steps required to close the CCR Unit, design plans and a schedule for closure. The plan calls for closure of the impoundment by removal of the CCR. A copy of the latest Closure Plan Schedule is included as Figure 3.

The final cease receipt of waste streams to the WDA is scheduled to occur in Q2 2026 providing sufficient time for planned cessation of operations reliant on inflow to the WDA and allowing for the forecasted sequence and schedule of closure activities within the regulatory closure deadline.

7.0 OPERATOR RESPONSIBILITY

As addressed in this section, after preparation of the Demonstration and submittal on or before November 30, 2020, additional requirements must be met by NIPSCO relative to the 40 CFR §257.102(f)(2) regulations. In addition to compliance with requirements as outlined in 40 CFR §257.103(f)(2)(vi), following submission of the Demonstration to U. S. EPA NIPSCO will comply with the recordkeeping requirements specified in §257.105(i), the notification requirements specified in §257.106(i), and the internet posting requirements in §257.107(i), as applicable and as detailed below.

In accordance with the requirements of 40 CFR §257.103(f)(2)(viii), NIPSCO will upon submission of the Demonstration Addendum 2 prepare and place in the RMSGS operating record and on its publicly accessible CCR internet site a new notification of intent to comply with the site-specific alternative to initiation of closure due to permanent cessation of a coal-fired boiler(s) by a date certain. This notification will include a reference to the submission date along with a copy of the Demonstration.

Pursuant to the requirements of 40 CFR §257.103(f)(2)(ix), upon receipt from EPA of its decision as described in §257.103(f)(3) NIPSCO will place a copy of the approved or denied decision in the RMSGS operating record and the NIPSCO publicly accessible CCR internet site. In addition, NIPSCO will prepare a notification of the availability of the EPA decision.

Per the requirements of 40 CFR §257.103(f)(2)(x), NIPSCO will prepare an annual progress report documenting continued lack of alternative capacity and progress towards the closure of the WDA. Successful completion of the progress report will be documented by its placement in the RMSGS operating record. NIPSCO will also prepare a notification of the availability of the annual progress report and place a copy of the report on the NIPSCO publicly available CCR internet site. The next annual progress report will be completed in October 2022.

8.0 CLOSING

It is Golder's opinion that the information contained the October 2020 Demonstration, November 2020 Demonstration Addendum 1, and August 2022 Demonstration Addendum 2 is true, accurate and has been prepared in accordance with good engineering practices and that the documentation provided for continued operation and alternative deadlines to initiate closure of the WDA, without consideration of increase in costs or inconvenience to NIPSCO, in accordance with §257.103(f)(2), demonstrates that there is presently no existing alternative disposal capacity on- or off-Site that could accept the flow currently being impounded in the WDA at RMSGS.

9.0 REFERENCES

Golder Associates (2016a), NIPSCO R. M. Schahfer Generating Station, Hazard Potential Classification Assessment and Visual Inspection Report – RCRA CCR Units, Pursuant to 40 CFR § 257.73, September 2016.

Golder Associates (2016b), NIPSCO R. M. Schahfer Generating Station, CCR Surface Impoundment Inflow Design Flood Control System Plan, Pursuant to 40 CFR § 257.82, October 2016.

Golder Associates (2017), NIPSCO R. M. Schahfer Generating Station, CCR Groundwater Monitoring Program Implementation Manual, October 2017.

Golder Associates (2019), NIPSCO R. M. Schahfer Generating Station, CCR Assessment of Corrective Measures, April 2019.

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Table 1 Monitoring Well Construction Details
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Monitoring Well ID	Ground Surface Elevation (ft-amsl)	Total Borehole Depth (ft)	Top of Casing Elevation (ft-amsl)	Sounded Well Depth (ft-btoc)	Well Material	Screen Length (ft)	Screen Depth		Screen Elevation		
								Top (ft-bgs)	Bottom (ft-bgs)	Top (ft-amsl)	Middle (ft-amsl)	Bottom (ft-amsl)
WDA	GAMW01	664.90	15.00	668.19	18.86	2" Sch 40 PVC	10.00	5.00	15.00	659.90	654.90	649.90
	GAMW01B	665.20	36.00	667.87	37.80	2" Sch 40 PVC	10.00	26.00	36.00	639.20	634.20	629.20
	GAMW02	666.08	15.00	669.57	19.00	2" Sch 40 PVC	10.00	5.00	15.00	661.08	656.08	651.08
	GAMW03	665.14	15.00	668.77	18.30	2" Sch 40 PVC	10.00	5.00	15.00	660.14	655.14	650.14
	GAMW03B	665.29	35.00	668.16	37.79	2" Sch 40 PVC	10.00	25.00	35.00	640.29	635.29	630.29
	GAMW05	666.69	17.00	669.75	20.01	2" Sch 40 PVC	10.00	7.00	17.00	659.69	654.69	649.69
	GAMW12	664.35	15.00	667.29	18.17	2" Sch 40 PVC	10.00	5.00	15.00	659.35	654.35	649.35
	GAMW12B	664.23	35.00	666.81	37.82	2" Sch 40 PVC	10.00	25.00	35.00	639.23	634.23	629.23
	GAMW13	664.31	15.00	667.24	18.45	2" Sch 40 PVC	10.00	5.00	15.00	659.31	654.31	649.31
	GAMW13B	664.23	35.00	667.12	38.86	2" Sch 40 PVC	10.00	25.00	35.00	639.23	634.23	629.23
	GAMW14	664.76	15.00	667.96	18.43	2" Sch 40 PVC	10.00	5.00	15.00	659.76	654.76	649.76
	GAMW14B	664.62	35.00	667.94	39.19	2" Sch 40 PVC	10.00	25.00	35.00	639.62	634.62	629.62
	GAMW42	663.12	15.00	665.80	17.97	2" Sch 40 PVC	10.00	5.00	15.00	658.12	653.12	648.12
	GAMW42B	663.15	36.00	665.66	36.70	2" Sch 40 PVC	10.00	26.00	36.00	637.15	632.15	627.15
	GAMW42C	663.20	50.00	666.28	52.91	2" Sch 40 PVC	10.00	40.00	50.00	623.20	618.20	613.20
	GAMW43	663.14	15.00	665.59	18.29	2" Sch 40 PVC	10.00	5.00	15.00	658.14	653.14	648.14
	GAMW43B	663.12	26.00	665.53	32.28	2" Sch 40 PVC	10.00	16.00	26.00	647.12	642.12	637.12
	GAMW44	664.11	15.00	666.31	16.02	2" Sch 40 PVC	10.00	5.00	15.00	659.11	654.11	649.11
	GAMW44B	664.11	36.00	666.25	38.82	2" Sch 40 PVC	10.00	26.00	36.00	638.11	633.11	628.11
	GAMW51	666.15	15.00	668.77	18.58	2" Sch 40 PVC	10.00	5.00	15.00	661.15	656.15	651.15
	GAMW51B	666.03	37.00	668.79	39.99	2" Sch 40 PVC	10.00	27.00	37.00	639.03	634.03	629.03
	GAMW57	670.46	15.00	672.97	25.55	2" Sch 40 PVC	10.00	5.00	15.00	665.46	660.46	655.46
	GAMW57B	670.45	45.00	672.88	47.45	2" Sch 40 PVC	10.00	35.00	45.00	635.45	630.45	625.45
	GAMW58	664.99	15.00	667.54	17.58	2" Sch 40 PVC	10.00	5.00	15.00	659.99	654.99	649.99
	GAMW58B	664.88	36.00	667.59	37.81	2" Sch 40 PVC	10.00	26.00	36.00	638.88	633.88	628.88
	GAMW59	665.93	15.00	668.49	17.22	2" Sch 40 PVC	10.00	5.00	15.00	660.93	655.93	650.93
	GAMW59B	665.95	40.00	668.55	42.36	2" Sch 40 PVC	10.00	30.00	40.00	635.95	630.95	625.95
	GAMW60	665.08	15.00	667.50	17.39	2" Sch 40 PVC	10.00	5.00	15.00	660.08	655.08	650.08
	GAMW60B	665.06	40.00	667.50	42.59	2" Sch 40 PVC	10.00	30.00	40.00	635.06	630.06	625.06
	GAMW65B	665.45	35.00	668.67	37.95	2" Sch 40 PVC	10.00	25.00	35.00	640.45	635.45	630.45
	GAMW66B	669.20	44.00	672.99	47.80	2" Sch 40 PVC	10.00	34.00	44.00	635.20	630.20	625.20
	GAMW67B	664.65	40.50	667.97	43.75	2" Sch 40 PVC	10.00	30.50	40.50	634.15	629.15	624.15
	GAMW68	665.93	17.00	665.53	17.03	2" Sch 40 PVC	10.00	7.00	17.00	658.93	653.93	648.93
	GAMW68B	666.00	34.50	665.72	34.78	2" Sch 40 PVC	10.00	24.50	34.50	641.50	636.50	631.50
MSRB, MCWB, and Drying Area	GAMW04	665.81	15.00	669.21	17.86	2" Sch 40 PVC	10.00	5.00	15.00	660.81	655.81	650.81
	GAMW06	667.50	15.00	670.81	18.82	2" Sch 40 PVC	10.00	5.00	15.00	662.50	657.50	652.50
	GAMW07	666.55	15.00	669.89	18.89	2" Sch 40 PVC	10.00	5.00	15.00	661.55	656.55	651.55
	GAMW07B	666.83	40.00	669.99	42.40	2" Sch 40 PVC	10.00	30.00	40.00	636.83	631.83	626.83
	GAMW08	665.95	15.00	669.66	18.78	2" Sch 40 PVC	10.00	5.00	15.00	660.95	655.95	650.95
	GAMW08B	665.92	36.00	668.47	38.79	2" Sch 40 PVC	10.00	26.00	36.00	639.92	634.92	629.92
	GAMW09	665.10	15.00	668.99	18.48	2" Sch 40 PVC	10.00	5.00	15.00	660.10	655.10	650.10
	GAMW09B	665.35	35.00	668.29	37.42	2" Sch 40 PVC	10.00	25.00	35.00	640.35	635.35	630.35
	GAMW15	665.01	15.00	668.25	18.71	2" Sch 40 PVC	10.00	5.00	15.00	660.01	655.01	650.01
	GAMW15B	665.14	35.00	668.05	38.86	2" Sch 40 PVC	10.00	25.00	35.00	640.14	635.14	630.14
	GAMW16*	665.20	15.00	668.37	18.20	2" Sch 40 PVC	10.00	5.00	15.00	660.20	655.20	650.20
	GAMW16R	664.35	20.00	667.17	21.75	2" Sch 40 PVC	10.00	10.00	20.00	654.35	649.35	644.35
	GAMW16B*	665.16	35.00	667.76	40.13	2" Sch 40 PVC	10.00	25.00	35.00	640.16	635.16	630.16
	GAMW16BR	664.39	40.00	667.32	42.45	2" Sch 40 PVC	10.00	30.00	40.00	634.39	629.39	624.39
	GAMW17	668.81	15.00	671.93	18.00	2" Sch 40 PVC	10.00	5.00	15.00	663.81	658.81	653.81
	GAMW17B	668.86	35.00	670.60	40.34	2" Sch 40 PVC	10.00	25.00	35.00	643.86	638.86	633.86
	GAMW18	666.04	15.00	669.07	18.51	2" Sch 40 PVC	10.00	5.00	15.00	661.04	656.04	651.04
	GAMW18B	665.94	35.00	668.47	35.89	2" Sch 40 PVC	10.00	25.00	35.00	640.94	635.94	630.94
	GAMW46	661.99	15.00	664.80	17.50	2" Sch 40 PVC	10.00	5.00	15.00	656.99	651.99	646.99
	GAMW46B	661.98	32.00	664.79	33.00	2" Sch 40 PVC	10.00	22.00	32.00	639.98	634.98	629.98
	GAMW52	664.07	15.00	666.79	18.50	2" Sch 40 PVC	10.00	5.00	15.00	659.07	654.07	649.07
	GAMW52B	664.50	37.00	666.90	39.34	2" Sch 40 PVC	10.00	27.00	37.00	637.50	632.50	627.50
	GAMW53	664.68	15.00	667.24	17.49	2" Sch 40 PVC	10.00	5.00	15.00	659.68	654.68	649.68
	GAMW53B	664.62	36.00	667.29	40.10	2" Sch 40 PVC	10.00	26.00	36.00	638.62	633.62	628.62
	GAMW54	663.87	15.00	666.37	15.46	2" Sch 40 PVC	10.00	5.00	15.00	658.87	653.87	648.87
	GAMW54B	663.98	32.00	666.47	36.41	2" Sch 40 PVC	10.00	22.00	32.00	641.98	636.98	631.98
	GAMW55*	665.06	15.00	667.64	18.68	2" Sch 40 PVC	10.00	5.00	15.00	660.06	655.06	650.06
	GAMW55R	665.36	15.00	667.71	16.31	2" Sch 40 PVC	10.00	5.00	15.00	660.36	655.36	650.36
	GAMW55B	665.18	35.00	667.53	37.60	2" Sch 40 PVC	10.00	25.00	35.00	640.18	635.18	630.18
	GAMW56	665.43	15.00	667.91	15.56	2" Sch 40 PVC	10.00	5.00	15.00	660.43	655.43	650.43
	GAMW56B	665.33	35.00	667.82	36.84	2" Sch 40 PVC	10.00	25.00	35.00	640.33	635.33	630.33
	GAMW63B	668.31	33.00	668.74	35.43	2" Sch 40 PVC	10.00	23.00	33.00	643.31	638.31	633.31
	GAMW64B	664.42	31.00	666.83	33.26	2" Sch 40 PVC	10.00	21.00	31.00	643.42	638.42	633.42

Table 1 Monitoring Well Construction Details
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Monitoring Well ID	Ground Surface Elevation (ft-amsl)	Total Borehole Depth (ft)	Top of Casing Elevation (ft-amsl)	Sounded Well Depth (ft-btoc)	Well Material	Screen Length (ft)	Screen Depth		Screen Elevation		
								Top (ft-bgs)	Bottom (ft-bgs)	Top (ft-amsl)	Middle (ft-amsl)	Bottom (ft-amsl)
Landfill Phase V, Phase VI, and Phase VII	GAMW20	664.61	16.00	667.21	18.95	2" Sch 40 PVC	10.00	6.00	16.00	658.61	653.61	648.61
	GAMW20B	664.48	36.00	667.40	18.22	2" Sch 40 PVC	10.00	26.00	36.00	639.48	634.48	629.48
	GAMW21*	666.60	18.00	668.38	20.36	2" Sch 40 PVC	10.00	8.00	18.00	658.60	653.60	648.60
	GAMW21B*	666.66	37.00	669.37	36.34	2" Sch 40 PVC	10.00	27.00	37.00	639.66	634.66	629.66
	GAMW22*	666.33	18.00	668.64	20.38	2" Sch 40 PVC	13.00	5.00	18.00	661.33	654.83	648.33
	GAMW22B*	666.39	37.00	669.38	37.13	2" Sch 40 PVC	10.00	27.00	37.00	639.39	634.39	629.39
	GAMW23*	667.02	19.00	668.34	20.30	2" Sch 40 PVC	14.00	5.00	19.00	662.02	655.02	648.02
	GAMW23B*	667.03	38.00	670.02	37.92	2" Sch 40 PVC	10.00	28.00	38.00	639.03	634.03	629.03
	GAMW24	662.09	16.00	665.46	20.31	2" Sch 40 PVC	10.00	6.00	16.00	656.09	651.09	646.09
	GAMW24B	662.13	31.00	665.43	35.38	2" Sch 40 PVC	10.00	21.00	31.00	641.13	636.13	631.13
	GAMW25	665.26	16.00	668.07	19.43	2" Sch 40 PVC	10.00	6.00	16.00	659.26	654.26	649.26
	GAMW25B	665.26	35.00	667.97	37.00	2" Sch 40 PVC	10.00	25.00	35.00	640.26	635.26	630.26
	GAMW26	664.89	16.00	667.83	20.00	2" Sch 40 PVC	10.00	6.00	16.00	658.89	653.89	648.89
	GAMW26B	664.91	33.00	667.76	37.08	2" Sch 40 PVC	10.00	23.00	33.00	641.91	636.91	631.91
	GAMW27	662.68	16.00	665.57	20.00	2" Sch 40 PVC	10.00	6.00	16.00	656.68	651.68	646.68
	GAMW27B	662.65	31.00	665.52	34.73	2" Sch 40 PVC	10.00	21.00	31.00	641.65	636.65	631.65
	GAMW28*	662.24	16.00	665.56	20.15	2" Sch 40 PVC	10.00	6.00	16.00	656.24	651.24	646.24
	GAMW28B*	662.32	29.00	665.62	32.92	2" Sch 40 PVC	10.00	19.00	29.00	643.32	638.32	633.32
	GAMW29	666.58	16.00	669.48	20.39	2" Sch 40 PVC	10.00	6.00	16.00	660.58	655.58	650.58
	GAMW29B	666.64	36.00	669.43	40.52	2" Sch 40 PVC	10.00	26.00	36.00	640.64	635.64	630.64
	GAMW30	664.27	16.00	666.92	20.40	2" Sch 40 PVC	10.00	6.00	16.00	658.27	653.27	648.27
	GAMW30B	664.27	32.00	666.96	35.49	2" Sch 40 PVC	10.00	22.00	32.00	642.27	637.27	632.27
	GAMW31	662.68	16.00	665.39	19.26	2" Sch 40 PVC	10.00	6.00	16.00	656.68	651.68	646.68
	GAMW31B	662.69	30.00	665.40	32.10	2" Sch 40 PVC	10.00	20.00	30.00	642.69	637.69	632.69
	GAMW32	665.44	18.00	668.09	21.07	2" Sch 40 PVC	10.00	8.00	18.00	657.44	652.44	647.44
	GAMW32B	665.53	34.00	668.25	36.93	2" Sch 40 PVC	10.00	24.00	34.00	641.53	636.53	631.53
	GAMW33	662.63	16.00	665.24	20.33	2" Sch 40 PVC	10.00	6.00	16.00	656.63	651.63	646.63
	GAMW33B	662.43	31.00	665.25	35.35	2" Sch 40 PVC	10.00	21.00	31.00	641.43	636.43	631.43
	GAMW34	661.78	16.00	664.83	20.28	2" Sch 40 PVC	10.00	6.00	16.00	655.78	650.78	645.78
	GAMW34B	661.65	29.00	664.84	30.48	2" Sch 40 PVC	10.00	19.00	29.00	642.65	637.65	632.65
	GAMW35B	661.78	24.00	664.81	28.66	2" Sch 40 PVC	10.00	14.00	24.00	647.78	642.78	637.78
	GAMW36	662.24	16.00	664.97	20.28	2" Sch 40 PVC	10.00	6.00	16.00	656.24	651.24	646.24
	GAMW36B	662.35	25.50	665.04	35.33	2" Sch 40 PVC	1.00	24.50	25.50	637.85	637.35	636.85
	GAMW37B	662.68	25.00	665.36	27.78	2" Sch 40 PVC	10.00	15.00	25.00	647.68	642.68	637.68
	GAMW38	660.93	15.00	663.29	17.97	2" Sch 40 PVC	10.00	5.00	15.00	655.93	650.93	645.93
	GAMW38B	660.81	29.50	663.31	32.00	2" Sch 40 PVC	10.00	19.50	29.50	641.31	636.31	631.31
	GAMW39	661.04	15.00	663.53	17.95	2" Sch 40 PVC	10.00	5.00	15.00	656.04	651.04	646.04
	GAMW39B	660.96	29.50	663.49	31.15	2" Sch 40 PVC	10.00	19.50	29.50	641.46	636.46	631.46
	GAMW40	664.11	15.00	666.56	19.94	2" Sch 40 PVC	10.00	5.00	15.00	659.11	654.11	649.11
	GAMW40B	664.05	31.50	666.40	35.16	2" Sch 40 PVC	10.00	21.50	31.50	642.55	637.55	632.55
	GAMW41	660.09	15.00	662.43	16.40	2" Sch 40 PVC	10.00	5.00	15.00	655.09	650.09	645.09
	GAMW41B	660.08	27.00	662.17	30.04	2" Sch 40 PVC	10.00	17.00	27.00	643.08	638.08	633.08
	GAMW48	660.81	15.00	663.38	17.00	2" Sch 40 PVC	10.00	5.00	15.00	655.81	650.81	645.81
	GAMW48B	660.44	30.00	663.33	32.30	2" Sch 40 PVC	10.00	20.00	30.00	640.44	635.44	630.44
	GAMW49	662.00	15.00	664.64	14.18	2" Sch 40 PVC	10.00	5.00	15.00	657.00	652.00	647.00
	GAMW49B	662.12	33.00	664.52	34.82	2" Sch 40 PVC	10.00	23.00	33.00	639.12	634.12	629.12
	GAMW50	662.52	15.00	665.17	19.60	2" Sch 40 PVC	10.00	5.00	15.00	657.52	652.52	647.52
	GAMW50B	662.28	31.00	664.90	31.79	2" Sch 40 PVC	10.00	21.00	31.00	641.28	636.28	631.28
	GAMW10	663.99	15.00	667.83	18.75	2" Sch 40 PVC	10.00	5.00	15.00	658.99	653.99	648.99
	GAMW11	663.60	15.00	667.17	19.18	2" Sch 40 PVC	10.00	5.00	15.00	658.60	653.60	648.60
	MW-1D	666.36	NA	668.86	33.68	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-1S	666.43	NA	668.81	19.52	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA

Table 1 Monitoring Well Construction Details
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Monitoring Well ID	Ground Surface Elevation (ft-amsl)	Total Borehole Depth (ft)	Top of Casing Elevation (ft-amsl)	Sounded Well Depth (ft-btoc)	Well Material	Screen Length (ft)	Screen Depth		Screen Elevation		
								Top (ft-bgs)	Bottom (ft-bgs)	Top (ft-amsl)	Middle (ft-amsl)	Bottom (ft-amsl)
LANDFILL Phase V, Phase VI and Phase VII	MW-2S	662.10	NA	664.10	11.96	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-3D	664.84	NA	667.58	29.75	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-3S	664.82	NA	667.58	18.41	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-4D	664.13	NA	666.56	33.24	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-4S	664.26	NA	666.90	17.51	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-5D	662.75	NA	664.97	31.00	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-5S	662.72	NA	664.29	16.19	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-6D	661.79	NA	664.64	33.29	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-6S	662.01	NA	664.61	19.06	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-7D	662.01	NA	664.72	32.91	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-7S	661.99	NA	664.80	18.33	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-8D	661.34	NA	663.52	35.42	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-8S	661.42	NA	663.75	18.04	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-9D	661.84	NA	662.68	39.20	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-9S	661.83	NA	662.42	19.53	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-10D	662.20	NA	663.18	31.22	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-10S	661.95	NA	662.53	14.68	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-11D	661.51	NA	663.57	32.86	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-11S	661.46	NA	663.25	17.18	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-12D	661.58	NA	663.60	32.75	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-12S	661.54	NA	663.48	16.83	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-13D	662.03	NA	664.80	32.52	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-13S	662.22	NA	664.67	17.90	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-14D	662.84	NA	665.41	33.20	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	MW-14S	662.57	NA	665.24	17.72	2" Sch 40 PVC	NA	NA	NA	NA	NA	NA
	GAPIEZ07	665.15	15.00	668.77	18.91	2" Sch 40 PVC	10.00	5.00	15.00	660.15	655.15	650.15

Notes:

ft-bgs = Feet below ground surface

ft-amsl = Feet above mean sea level

ft-btoc = Feet below top of casing

WDA = Waste Disposal Area

MSRB = Material Storage Runoff Basin

MCWB = Metal Cleaning Waste Basin

No highlight indicates well is not part of the CCR monitoring program, however, water levels are measured in these wells to supplement groundwater contour maps

Yellow highlight indicates a CCR background well

Green highlight indicates a CCR downgradient well

2" Sch 40 PVC = Two-inch diameter well, constructed of schedule 40 polyvinyl chloride material

Survey elevations for new wells obtained from Marbach, Brady, and Weaver survey, June 2016, August 2018, June 2019, June 2020, and October 2020

*Decommissioned monitoring well.

Prepared by: DFSC
Checked by: KMC
Reviewed by: MAH

Table 2: Monitoring Well Installation Date and Purpose
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Well Purpose	Monitoring Well ID	Installation Date	Decommission Date (If Applicable)	Basis For Action
Waste Disposal Area	Background Monitoring Well	GAMW-03	6/27/2015	-	Installed for groundwater quality monitoring[1]
		GAMW-03B	5/24/2016	-	
		GAMW-68	8/27/2020	-	
		GAMW-68B	8/27/2020	-	
	Downgradient Monitoring Well	GAMW-01	6/26/2015	-	Installed for groundwater quality monitoring[1]
		GAMW-12	5/23/2016	-	
		GAMW-13	5/24/2016	-	
		GAMW-13B	5/23/2016	-	
		GAMW-14	5/23/2016	-	
		GAMW-14B	5/23/2016	-	
		GAMW-01B	7/31/2018	-	Installed to characterize the nature and extent of a potential release[2]
		GAMW-12B	7/31/2018	-	
		GAMW-51	7/25/2018	-	
		GAMW-51B	7/25/2018	-	
		GAMW-42	7/24/2018	-	Installed to monitor groundwater quality at the property boundary[3]
		GAMW-42B	7/24/2018	-	
		GAMW-42C	8/8/2019	-	
		GAMW-43	5/16/2018	-	
		GAMW-43B	5/16/2018	-	
		GAMW-44	5/16/2018	-	
		GAMW-44B	5/16/2018	-	
		GAMW-57	6/7/2019	-	
		GAMW-57B	6/7/2019	-	
		GAMW-58	6/6/2019	-	
		GAMW-58B	6/6/2019	-	
		GAMW-59	6/8/2019	-	Installed to characterize the nature and extent of a potential release[2]
		GAMW-59B	6/6/2019	-	
		GAMW-60	6/8/2019	-	
		GAMW-60B	6/4/2019	-	
Material Storage Runoff Basin, Metal Cleaning Waste Basin, and Drying Area	Background Monitoring Well	GAMW-04	6/27/2015	-	Installed for groundwater quality monitoring[1]
		GAMW-07	6/29/2015	-	
		GAMW-15	5/25/2016	-	
		GAMW-15B	5/24/2016	-	
		GAMW-07B	7/26/2018	-	Installed to provide additional groundwater quality data
	Downgradient Monitoring Well	GAMW-08	6/28/2015	-	Installed for groundwater quality monitoring[1]
		GAMW-09	6/28/2015	-	
		GAMW-09B	5/24/2016	-	
		GAMW-16	5/26/2016	NA	Removed during construction activities[5]
		GAMW-16R	9/23/2020	-	Installed to replace GAMW-16[5]
		GAMW-16B	5/25/2016	9/22/2020	Decommissioned due to construction activities[6]
		GAMW-16BR	9/22/2020	-	Installed to replace GAMW-16B[6]
		GAMW-17	5/25/2016	-	Installed for groundwater quality monitoring[1]
		GAMW-17B	5/25/2016	-	
		GAMW-18	5/24/2016	-	
		GAMW-08B	7/25/2018	-	Installed to characterize the nature and extent of a potential release[2]
		GAMW-18B	7/26/2018	-	
		GAMW-52	7/30/2018	-	
		GAMW-52B	7/30/2018	-	
		GAMW-53	7/30/2018	-	
		GAMW-53B	7/30/2018	-	
		GAMW-54	7/30/2018	-	
		GAMW-54B	7/27/2018	-	
		GAMW-55	7/26/2018	6/8/2019	Decommissioned due to well casing damage[4]
		GAMW-55R	6/8/2019	-	Installed to replace GAMW-55[4]
		GAMW-55B	7/26/2018	-	Installed to characterize the nature and extent of a potential release[2]
		GAMW-56	7/27/2018	-	
		GAMW-56B	7/27/2018	-	
		GAMW-46	5/15/2018	-	Installed to monitor groundwater quality at the property boundary[3]
		GAMW-46B	5/15/2018	-	

Table 2: Monitoring Well Installation Date and Purpose
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Well Purpose	Monitoring Well ID	Installation Date	Decommission Date (If Applicable)	Basis For Action
LANDFILL Phase V, Phase VI, and Phase VII	Background Monitoring Well	GAMW-20	5/27/2016	-	Installed for Groundwater Quality Monitoring[1]
		GAMW-24	9/26/2016	-	
		GAMW-24B	9/26/2016	-	
		GAMW-25	10/4/2016	-	
		GAMW-25B	10/5/2016	-	
	Downgradient Monitoring Well	GAMW-21	5/31/2016	4/5/2018	Abandoned due to Landfill Construction Activities[2]
		GAMW-21B	5/31/2016	4/5/2018	
		GAMW-22	5/31/2016	4/5/2018	
		GAMW-22B	6/2/2016	4/5/2018	
		GAMW-23	6/2/2016	4/6/2018	
		GAMW-23B	6/2/2016	4/6/2018	
		GAMW-28	9/29/2016	4/6/2018	
		GAMW-28B	9/29/2016	4/6/2018	
		GAMW-26	10/4/2016	-	Installed for Groundwater Quality Monitoring[1]
		GAMW-26B	10/4/2016	-	
		GAMW-27	10/3/2016	-	
		GAMW-27B	10/4/2016	-	
		GAMW-38	4/4/2018	-	Installed to Replace Abandoned Well[3]
		GAMW-38B	4/3/2018	-	
		GAMW-39	4/4/2018	-	
		GAMW-39B	4/4/2018	-	
		GAMW-40	4/5/2018	-	
		GAMW-40B	4/4/2018	-	
		GAMW-41	5/17/2018	-	
		GAMW-41B	5/17/2018	-	

1) Per 40 CFR §257.93, Golder collected eight rounds of background data prior to October 17, 2017, excluding wells GAMW-68 and GAMW-68B.

2) Per 40 CFR §257.95(g)(1)(i) Rule requirements, Golder collected additional data to further characterize the nature and extent of potential groundwater impacts.

3) Per 40 CFR §257.95(g)(1)(ii), Golder collected data to monitor groundwater quality in the direction of flow at the property boundary.

4) Golder field personnel were unable to collect a groundwater sample from monitoring well GAMW-55 during the April 2019 Assessment Monitoring sampling event due to surface damage (i.e., tubing above the permanent pump was pinched at less than 10 feet below ground surface). The well was replaced with GAMW-55R in June 2019.

5) Monitoring well GAMW-16 was completely removed during construction excavation activities in 2020. No decommissioning was required. The well was replaced with GAMW-16R in September 2020.

6) Monitoring well GAMW-16B was decommissioned during construction activities in 2020. The well was replaced with GAMW-16BR in September 2020.

NA= Not applicable

Prepared by: KMC
Checked by: DFSC
Reviewed by: MAH

Table 3: Unit-Specific Groundwater Protection Standards
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Analyte	MCL (mg/L)	GWPS (mg/L)[2]	GWPS (mg/L)[3]
Waste Disposal Area	Antimony	0.006	0.006	0.006
	Arsenic	0.01	0.015	0.018
	Barium	2	2	2
	Beryllium	0.004	0.004	0.004
	Cadmium	0.005	0.005	0.005
	Chromium	0.1	0.1	0.1
	Cobalt[1]	0.006	0.015	0.015
	Fluoride	4	4	4
	Lead[1]	0.015	0.015	0.015
	Lithium[1]	0.04	0.04	0.04
	Mercury	0.002	0.002	0.002
	Molybdenum[1]	0.1	0.1	0.1
	Radium 226+228	5	5	5
	Selenium	0.05	0.05	0.05
	Thallium	0.002	0.002	0.002
MSRB, MCWB, and Drying Area	Antimony	0.006	0.006	0.006
	Arsenic	0.01	0.078	0.091
	Barium	2	2	2
	Beryllium	0.004	0.004	0.004
	Cadmium	0.005	0.005	0.005
	Chromium	0.1	0.1	0.1
	Cobalt[1]	0.006	0.01	0.01
	Fluoride	4	4	4
	Lead[1]	0.015	0.015	0.015
	Lithium[1]	0.04	0.04	0.04
	Mercury	0.002	0.002	0.002
	Molybdenum[1]	0.1	0.1	0.1
	Radium 226+228	5	5	5
	Selenium	0.05	0.05	0.05
	Thallium	0.002	0.002	0.002

Notes:
MCL= Environmental Protection Agency Maximum Contaminant Level
GWPS= Groundwater Protection Standard
mg/L= milligrams per liter

1) As of August 29, 2018, these four constituents have health-based standards that can be used when calculating the GWPS, these health-based standards are not MCLs but are provided in the MCL column.
2) GWPS calculated in August 2018.
3) GWPS calculated in March 2020.

Prepared by: KMC
Checked by: DFSC
Reviewed by: JSP

Table 4: Dates and Purposes of Each Monitoring Event
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Well Purpose	Monitoring Well ID	Sample Event #15	Sample Event #16	Sample Event #17
Purpose of Sample		Semi-Annual Assessment Monitoring	Annual Assessment Monitoring	Semi-Annual Assessment Monitoring
Sample Parameters		Appendix III and Appendix IV	Appendix III and Appendix IV	Appendix III and detected Appendix IV
WDA Background Monitoring Well	GAMW03	10/22/2020	4/14/2021	9/17/2021
	GAMW03B	10/22/2020	4/15/2021	9/17/2021
	GAMW68	10/29/2020	4/22/2021	9/17/2021
	GAMW68B	10/29/2020	4/22/2021	9/17/2021
WDA Downgradient Monitoring Well	GAMW01	10/21/2020	4/14/2021	9/16/2021
	GAMW01B	10/21/2020	4/14/2021	9/16/2021
	GAMW12	10/20/2020	4/15/2021	9/16/2021
	GAMW12B	10/20/2020	4/15/2021	9/16/2021
	GAMW13	10/20/2020	4/19/2021	9/17/2021
	GAMW13B	10/20/2020	4/19/2021	9/17/2021
	GAMW14	10/20/2020	4/19/2021	9/17/2021
	GAMW14B	10/20/2020	4/19/2021	9/17/2021
	GAMW42	10/15/2020	4/23/2021	9/14/2021
	GAMW42B	10/15/2020	4/23/2021	9/14/2021
	GAMW42C	10/15/2020	4/23/2021	9/15/2021
	GAMW43	10/15/2020	4/23/2021	9/14/2021
	GAMW43B	10/16/2020	4/27/2021	9/14/2021
	GAMW44	10/16/2020	4/27/2021	9/15/2021
	GAMW44B	10/16/2020	4/27/2021	9/15/2021
	GAMW51	10/27/2020	4/21/2021	9/29/2021
	GAMW51B	10/27/2020	4/21/2021	9/29/2021
	GAMW57	10/16/2020	4/23/2021	9/15/2021
	GAMW57B	10/16/2020	4/23/2021	9/15/2021
	GAMW58	10/19/2020	4/23/2021	9/15/2021
	GAMW58B	10/19/2020	4/23/2021	9/15/2021
	GAMW59	10/28/2020	4/21/2021	9/29/2021
	GAMW59B	10/28/2020	4/22/2021	9/29/2021
	GAMW60	10/28/2020	4/21/2021	9/24/2021
	GAMW60B	10/28/2020	4/21/2021	9/24/2021
Total Number of Samples		29	29	29

Table 4: Dates and Purposes of Each Monitoring Event
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Well Purpose	Monitoring Well ID	Sample Event #15	Sample Event #16	Sample Event #17
Purpose of Sample		Semi-Annual Assessment Monitoring	Annual Assessment Monitoring	Semi-Annual Assessment Monitoring
Sample Parameters		Appendix III and Detected Appendix IV	Appendix III and Appendix IV	Appendix III and Detected Appendix IV
MSRB, MCWB, and Drying Area Background Monitoring Well	GAMW-04	10/22/2020	4/15/2021	9/23/2021
	GAMW-07	10/27/2020	4/16/2021	9/21/2021
	GAMW-07B	10/27/2020	4/16/2021	9/23/2021
	GAMW-15	10/27/2020	4/16/2021	9/22/2021
	GAMW-15B	10/27/2020	4/16/2021	9/22/2021
MSRB, MCWB, and Drying Area Downgradient Monitoring Well	GAMW-08	10/26/2020	4/22/2021	9/24/2021
	GAMW-08B	10/23/2020	4/22/2021	9/24/2021
	GAMW-09	10/23/2020	4/20/2021	9/23/2021
	GAMW-09B	10/23/2020	4/20/2021	9/23/2021
	GAMW-16R	10/29/2020	4/22/2021	9/21/2021
	GAMW-16BR	10/26/2020	4/22/2021	9/21/2021
	GAMW-17	10/26/2020	4/14/2021	9/22/2021
	GAMW-17B	10/26/2020	4/14/2021	9/22/2021
	GAMW-18	10/23/2020	4/20/2021	9/16/2021
	GAMW-18B	10/23/2020	4/21/2021	9/17/2021
	GAMW-46	10/19/2020	4/27/2021	9/15/2021
	GAMW-46B	10/19/2020	4/27/2021	9/15/2021
	GAMW-52	10/22/2020	4/16/2021	9/30/2021
	GAMW-52B	10/23/2020	4/16/2021	9/30/2021
	GAMW-53	10/23/2020	4/16/2021	9/30/2021
	GAMW-53B	10/23/2020	4/16/2021	9/30/2021
	GAMW-54	10/23/2020	4/19/2021	10/1/2021
	GAMW-54B	10/23/2020	4/19/2021	10/1/2021
	GAMW-55R	10/28/2020	4/20/2021	10/1/2021
	GAMW-55B	10/28/2020	4/20/2021	10/1/2021
	GAMW-56	10/28/2020	4/20/2021	10/4/2021
	GAMW-56B	10/28/2020	4/21/2021	10/4/2021
Total Number of Samples		27	27	27

Table 4: Dates and Purposes of Each Monitoring Event
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

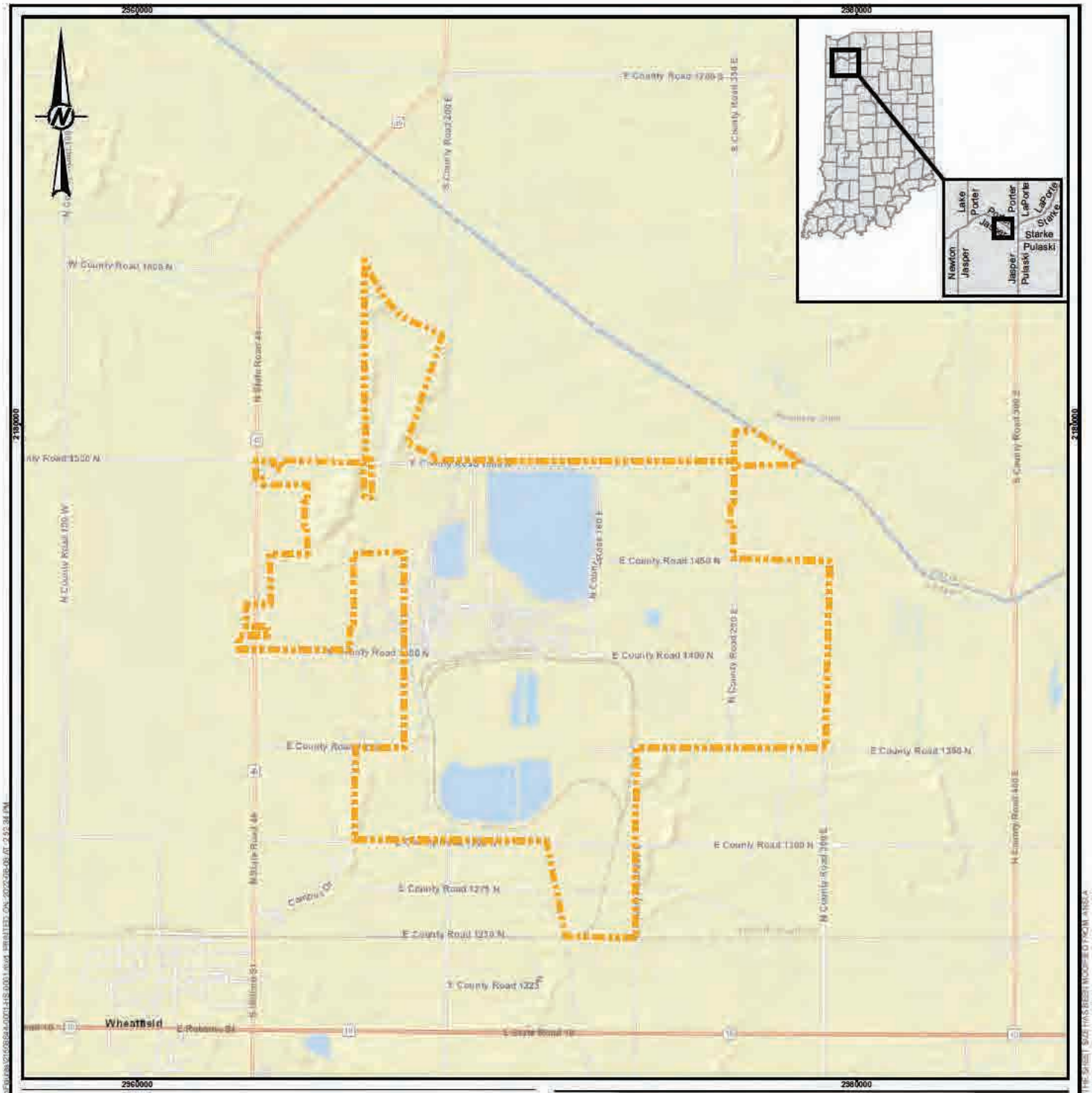
Well Purpose	Monitoring Well ID	Sample Event #15	Sample Event #16	Sample Event #17
Purpose of Sample		Detection Monitoring	Detection Monitoring	Detection Monitoring
Sample Parameters		Appendix III	Appendix III	Appendix III
Landfill Background Monitoring Well	GAMW-20	9/16/2020	4/12/2021	9/13/2021
	GAMW-24	9/15/2020	4/12/2021	9/13/2021
	GAMW-24B	9/15/2020	4/13/2021	9/13/2021
	GAMW-25	9/15/2020	4/12/2021	9/10/2021
	GAMW-25B	9/16/2020	4/12/2021	9/10/2021
Landfill Downgradient Monitoring Well	GAMW-26	9/16/2020	4/12/2021	9/10/2021
	GAMW-26B	9/16/2020	4/12/2021	9/10/2021
	GAMW-27	9/17/2020	4/13/2021	9/10/2021
	GAMW-27B	9/17/2020	4/13/2021	9/13/2021
	GAMW-38	9/17/2020	4/13/2021	9/11/2021
	GAMW-38B	9/17/2020	4/13/2021	9/11/2021
	GAMW-39	9/17/2020	4/13/2021	9/11/2021
	GAMW-39B	9/17/2020	4/13/2021	9/11/2021
	GAMW-40	9/17/2020	4/14/2021	9/13/2021
	GAMW-40B	9/21/2020	4/14/2021	9/13/2021
	GAMW-41	9/21/2020	4/14/2021	9/13/2021
	GAMW-41B	9/21/2020	4/13/2021	9/13/2021
Total Number of Samples		17	17	17

Notes:
Sample counts do not include QC/QA samples.

(1) Sample events #1-14 were completed prior to October 2020. The purpose, sample parameters, and sample dates are included in the Demonstration or Demonstration Addendum.

(2) Semi-annual assessment monitoring parameters did not include radium.

Prepared by: KMC
Checked by: DFSC
Reviewed by: MAH



LEGEND

Approximate Property Line

0 0.75 1.5

1 " = 0.75 mi Miles

REFERENCE(S)

SERVICE LAYER CREDITS: SOURCES: ESRI, HERE, GARMIN, USGS, NTERMAP, INCREMENT P, NRCAN, ESRI JAPAN, METI, ESRI CH NA (HONG KONG), ESRI KOREA, ESRI (THAILAND), NGCC, (C) OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

PART A DEMONSTRATION
R. M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

SITE LOCATION MAP

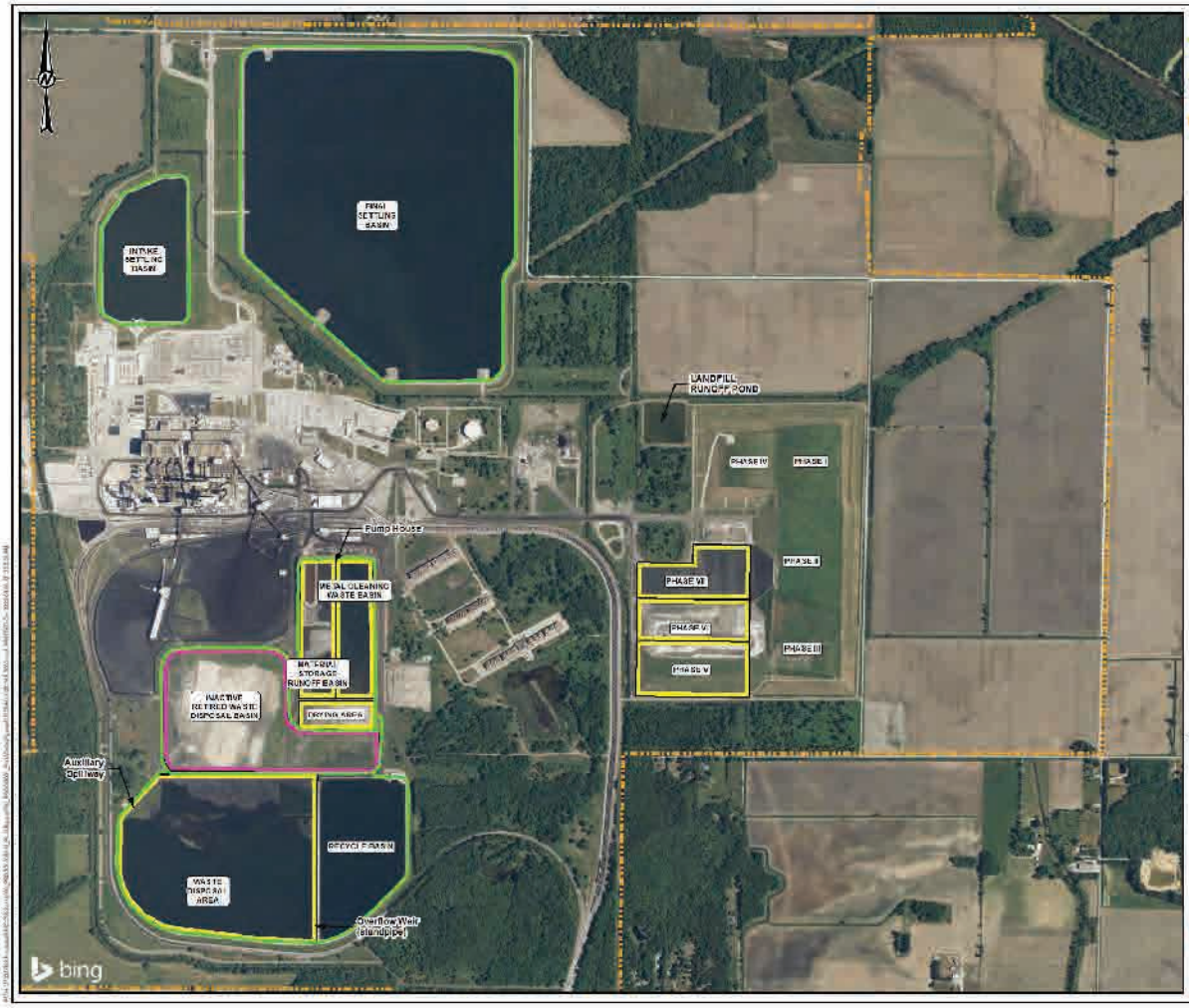
CONSULTANT

WSP GOLDER

YYYY-MM-DD	2022-06-08
DESIGNED	DFS
PREPARED	SHL
REVIEWED	JSP
APPROVED	MAH

PROJECT NO.	CONTROL	REV.	FIGURE
GL21508844	A	0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI A



LEGEND

- Slurry Wall
- CCR Units
- Approximate Extent of Inactive Retired Waste Disposal Basin
- Approximate Property Line

0 1,000 2,000

Feet

NOTE(S)

REFERENCE(S)

© 2022 MICROSOFT CORPORATION © 2022 MAXAR SNAPS © 2022 DIGITALGLOBE, EARTHSTAR GEOGRAPHICS

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

FACILITY SITE PLAN

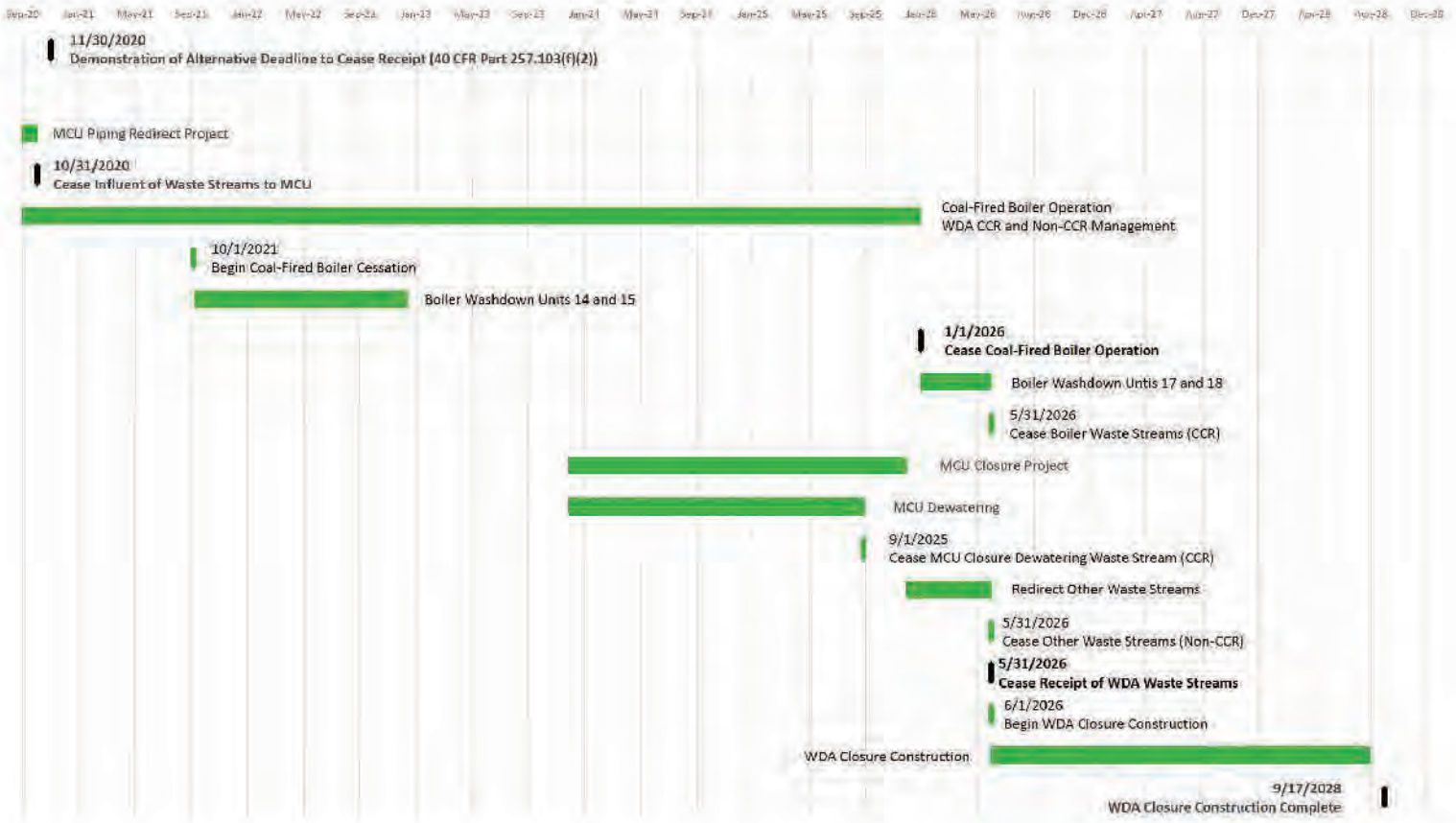
CONSULTANT

wsp GOLDER

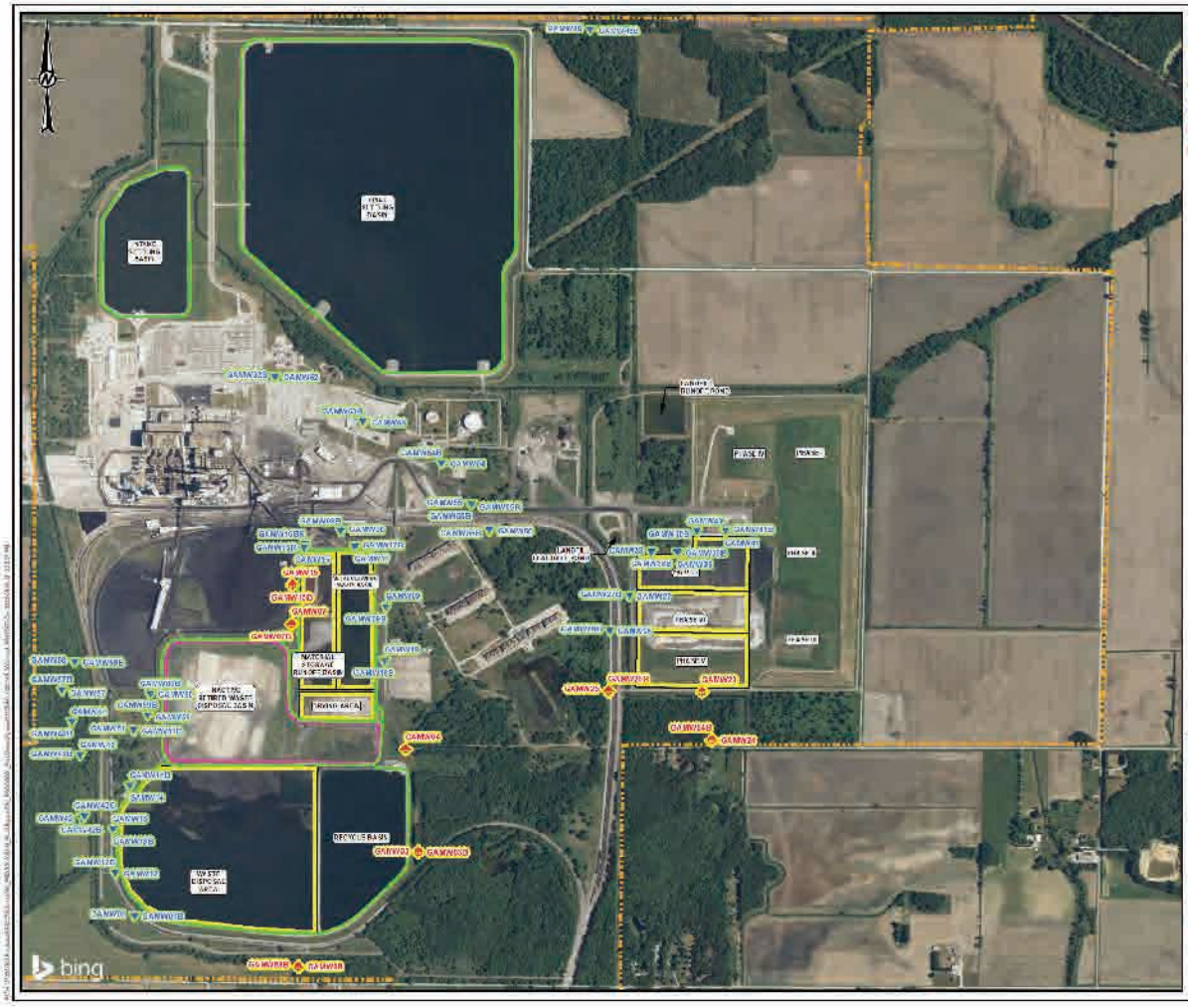
PROJECT NO.	CONTROL
21500044	A
REV.	FIGURE
0	2

DESIGNED	TR
PREPARED	SHL
REVIEWED	BMR
APPROVED	MMH

Figure 3
Operation and Closure Schedule



GOLDER



CLIENT
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE
MONITORING WELL LOCATION MAP

CONSULTANT
GOLDER

YYYY-MM-DD	2022-05-06
DESIGNED	TH
PREPARED	SHL
REVIEWED	RM
APPROVED	MAR

PROJECTION: GI21500044 | CONTROL: A | REV: 0 | FIGURE: 4

APPENDIX A

Part A Demonstration Annual Progress Report #01-21 40 CFR Part §257. 103(f)(2)(X)

DEMONSTRATION ANNUAL PROGRESS REPORT #01-21

DATE October 29, 2021 **Project No.** 20368079

TO Jeff Loewe, Maureen Turman, Joe Kutch, Maggie Rice
Northern Indiana Public Service Company LLC

CC Richard Wesenberg, Danielle Sylvia Cofelice

FROM Mark Haney **EMAIL mhaney@golder.com**

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC
R. M. SCHAHFER GENERATING STATION, WASTE DISPOSAL AREA
40 CFR §257.103(F)(2)(X) PART A DEMONSTRATION ANNUAL PROGRESS REPORT #01-21

On October 30, 2020 in accordance with the requirements of 40 Code of Federal Regulations (CFR) §257.103(f)(2), Northern Indiana Public Service Company LLC (NIPSCO) submitted the "*NIPSCO LLC RMSGS Demonstration of Site-specific Alternative Deadline to Initiate Closure of CCR Surface Impoundment Due to Permanent Cessation of Coal-Fired Boilers by a Date Certain*" (hereinafter Demonstration) for the NIPSCO R.M. Schahfer Generating Station (RMSGS or Site), 2723 E 1500 N Road, Wheatfield, Jasper County, Indiana. The Demonstration, the subject of which is the Coal Combustion Residuals (CCR) Rule regulated surface impoundment referred to as the Waste Disposal Area (WDA), was submitted to and is currently under review by the United States Environmental Protection Agency (USEPA).

Both the text of the 2020 Demonstration and 40 CFR §257.103(f)(2)(x) address completion of an annual report documenting the continued lack of alternative capacity and the progress toward the closure of the surface impoundment. This Demonstration Annual Progress Report #01-21 (hereinafter Report) fulfills the 40 CFR §257.103(f)(2)(x) regulatory requirement and the reporting commitments as outlined in the Demonstration. In addition to providing the aforementioned information, the Report serves as an update on select additional RMSGS CCR Rule compliance and Demonstration actions completed by NIPSCO subsequent to the October 2020 submission.

Progress Toward Closure/Permanent Cessation of Coal-Fired Boiler Operations

As of October 1, 2021, NIPSCO permanently shut down operations of Units 14 and 15, representing two of the four coal-fired boilers at RMSGS. Remaining Units 17 and 18 continue to operate, with management of CCR and non-CCR waste streams produced from these Units being provided by the WDA. Cessation of operations of the two coal-fired boilers is consistent with overall Site retirement plans and on schedule with NIPSCO's planned permanent cessation of all coal-fired generation activities by Q2 2023, as outlined in the Demonstration (Section 2.4 and Figure 3).

Golder Associates Inc.
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Ongoing Need for Operation of the WDA

As evidenced by the recent shut down of two of its four coal-fired boilers, NIPSCO is progressing toward permanent cessation of all coal-fired generation activities at RMSGS. Although Units 14 and 15 have been shut down, boiler decommissioning and washdown event(s) associated with these two Units will increase the generation of CCR and non-CCR wastewater and resultant discharge to the WDA for a period of time. Furthermore, Units 17 and 18 continue to operate at or near their capacity, generating substantial volumes of CCR and non-CCR waste streams as detailed in the Demonstration and discussed below. Thus, the need remains for existing capacity and continued operation of the WDA to meet both ongoing coal-fired generation and current and future decommissioning demands.

Aside from ongoing operational and future decommissioning needs, continued availability of the WDA is also a pivotal component in the planned closure of three other inactive CCR Rule regulated surface impoundments referred to collectively as the Multi-Cell Unit (MCU). A Closure Application, which has undergone several revisions in response to Indiana Department of Environmental Management (IDEM) reviews, is awaiting final IDEM approval. A key facet of the MCU closure by removal approach is the planned discharge of dewatering fluids to the WDA. As the only remaining operational CCR Rule regulated impoundment on-Site, discharge to the WDA is the only viable alternative for the management of high-volume dewatering effluent. Anticipating IDEM approval will be received, NIPSCO is in the construction contractor procurement stage. Contractor selection is expected within the next few months and closure construction activities, including dewatering, are currently planned for summer 2023. Completion of the 2023 closure activities, shutdown of the remaining coal-fired boilers, and conclusion of decommissioning activities will reduce reliance on the WDA as a CCR and non-CCR waste management unit.

As designed and constructed, most of NIPSCO's wastewater and stormwater systems feature a network of common sumps which ultimately discharge to the WDA. Until such time as CCR Rule regulated waste streams are no longer being generated, separation of the various sumps and pipelines is impractical, especially for a generating station with less than two years of active generation life remaining. Therefore, until cessation and decommissioning actions are completed, the WDA remains essential to the management of these high-volume waste streams. Once CCR generation activities cease and boiler decommissioning is complete, ongoing post-generation non-CCR waste streams can be managed in one or more existing NPDES-regulated non-CCR impoundments as an alternative to management in the WDA.

Continued Lack of Alternative Capacity

At the time of preparation of this Report the measurable reduction in Site-wide generation of CCR and non-CCR waste streams resulting from these boiler shutdowns could not be definitively quantified due to the absence of flow metering capacity in individual feed and discharge lines. However, in determination of alternative capacity and reliance for the operation of the WDA, the combined estimated average daily waste stream flow of 5.04 MGD reported in the Demonstration (i.e., October 2020) from Units 14 and 15, has been removed from the combined total waste stream flow considered in this Report. Note that such an approach assumes an instantaneous and maximum waste stream flow reduction (and does not account for the compulsory boiler washdown flow from Units' decommissioning) and is, as a result, considered a conservative compacity demand-based approach to this update. Therefore, due to ongoing Site operations and maintenance activities (e.g., boiler room sump dewatering for both shut down and active Units, stormwater collection and management), volumes of individual CCR and non-CCR effluent being discharged to the WDA are estimated to be between 0.34 MGD and 1.42 MGD, with a combined estimated daily flow of 4.1 MGD.

Consistent with the requirements of 40 CFR §257.103(f)(2)(x) and employing processes consistent with those used in the evaluation of alternate disposal capacity for the Demonstration, Golder Associates USA Inc. (Golder), *a member of WSP*, on behalf of NIPSCO, performed a valuation of its previous assessment. The continued lack of alternative capacity is supported by the following conclusions:

- No existing on-Site impoundment system can accept partial or total flows of CCR waste streams that are currently discharging into the WDA
- No alternative disposal available for CCR and non-CCR waste streams in the existing on-Site WWTP
- No existing off-loading or conveyance piping infrastructure to support on or off-Site alternative disposal of CCR or non-CCR waste streams
- Commercial tanker truck, railcar, on-Site infrastructure, and treatment capacity in the region continue to preclude off-Site transport and/or alternative disposal
- An employee and public health and safety risk associated with off-Site disposal due to the additional truck traffic both on-Site and on the public roads as well as an increased carbon footprint with added truck traffic
- An increased risk of release that could harm the environment every time the wastewater is handled (i.e., pumped for off-Site transport, pumped to the on-Site WWTP)

NIPSCO previously evaluated the feasibility of constructing new alternative CCR and non-CCR waste management options on-Site, even though RMSGS will cease all coal-fired generation in about one and one-half years. As in 2020, due to Site-specific factors (e.g., space limitations, shallow depth to groundwater and thus the inability to reasonably achieve the 40 CFR §257.60(a) five-foot separation from the upper limit of the uppermost aquifer), permitting and/or regulatory hurdles, and building timeframes, construction of new alternative management facilities is infeasible.

Based on current operating conditions and an updated evaluation regarding alternative disposal capacity, Golder concludes that no viable alternative to continued use of the WDA currently exists.

Additional NIPSCO Demonstration-Related Work Completed Subsequent to October 2020

In April 2019, NIPSCO completed an Assessment of Corrective Measures (ACM) in accordance with the requirements of 40 CFR §257.96. In November 2020, based upon informal feedback from USEPA officials regarding their interpretation of ACM content, Golder, on behalf of NIPSCO, prepared an Addendum (hereinafter Addendum #1) to the 2019 ACM. Addendum #1 was certified by a qualified Indiana-licensed professional engineer on November 30, 2020. Following certification, the ACM was placed in the facility operating record and NIPSCO posted it to their publicly accessible CCR website. In July 2021, consistent with changes to the Multi-Cell Unit (MCU) closure design and resultant impacts on remedy alternatives, Golder, on behalf of NIPSCO, prepared a second Addendum (hereinafter Addendum #2) to the 2020 ACM in accordance with the requirements of 40 CFR §257.96. Addendum #2 was certified by a qualified Indiana-licensed professional engineer on July 29, 2021. Following certification, the ACM was placed in the facility operating record and NIPSCO posted it to their publicly accessible CCR website. Predicated upon IDEM approval of the MCU Closure Application, NIPSCO expects the groundwater Selection of Remedy process to be completed in the next few months.

NIPSCO continues to perform all CCR Rule required activities at RMSGS' four regulated CCR surface impoundments and its multi-phase CCR landfill. Based upon its interpretation of the regulatory obligations, NIPSCO reasserts its facility-wide compliance with all applicable Part 257 requirements.

Conclusion

Golder completed the evaluation and prepared this Report on behalf of NIPSCO. The Report documents a) the continued lack of alternative capacity on-Site and off-Site, and b) NIPSCO's progress toward the closure of the RMSGS surface impoundment referred to as the WDA. NIPSCO currently anticipates no delays in the cease receipt date, or the final closure date as outlined in its 2020 Demonstration. As such, Golder submits this Report which fulfills the 40 CFR §257.103(f)(2)(x) annual progress reporting regulatory requirement and the reporting commitments as outlined in the Demonstration.

APPENDIX B

Certification of Facility Compliance
40 CFR Part §257.103(f)(2)(v)(C)(1)

Alternative Closure Requirements Certification of Compliance
Pursuant to 40 C.F.R. 257.103(f)

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

Northern Indiana Public Service Company LLC (NIPSCO) requires additional time to close the Waste Disposal Area ("WDA") and must continue to use the CCR surface impoundment due to the absence of alternative disposal capacity both on and offsite of the facility. In support of the demonstration, and as required by 40 C.F.R. §257.103(f)(2)(C)(1), NIPSCO submits the following certification:

> I hereby certify that to the best of my knowledge and inquiry of those persons who are immediately responsible for compliance with environmental regulations for the Waste Disposal Area at the NIPSCO R.M. Schahfer Generating System, the facility is in compliance with all of the requirements of 40 C.F.R. Part 257, Subpart D.

Kurt W. Sangster, Vice President Electric Generation
Northern Indiana Public Service Company LLC

8/15/2022
Date

APPENDIX C

Certifications of Design and Construction of Groundwater Monitoring Systems

May 2022

Certification of Design and Construction of Groundwater Monitoring System (40 CFR §257.91(f))

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

CCR Management Unit referred to as Waste Disposal Area

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of groundwater monitoring systems for surface impoundments and landfills, do hereby state that I am qualified in the subject matter of CCR groundwater monitoring. I have personally examined and am familiar with the information related to design and construction of groundwater monitoring systems for CCR management units located at the Northern Indiana Public Service Company (NIPSCO) R. M. Schahfer Generating Station, as provided in the Groundwater Monitoring System Design Manual Revision 4.0 prepared by Golder Associates Inc. and dated May 2022. Based on an inquiry of those individuals immediately responsible, and on supporting information which I understand to be true, accurate and complete, I believe the design and construction of the groundwater monitoring system for the Waste Disposal Area meets the applicable requirements of the CCR Final Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the groundwater monitoring system for the regulated CCR management unit referred to as Waste Disposal Area has been designed and constructed to meet the applicable requirements of 40 CFR §257.91 and corresponding State of Indiana requirements.



Daniel Sullivan
Indiana Professional Engineer
License #19600309

5·24·2022
Date

May 2022

Certification of Design and Construction of Groundwater Monitoring System (40 CFR §257.91(f))

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

CCR Management Units referred to as Drying Area, Material Storage Runoff Basin, and Metal Cleaning Waste Basin

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of groundwater monitoring systems for surface impoundments and landfills, do hereby state that I am qualified in the subject matter of CCR groundwater monitoring. I have personally examined and am familiar with the information related to design and construction of groundwater monitoring systems for CCR management units located at the Northern Indiana Public Service Company (NIPSCO) R. M. Schahfer Generating Station, as provided in the Groundwater Monitoring System Design Manual Revision 4.0, prepared by Golder Associates Inc. and dated May 2022. Based on an inquiry of those individuals immediately responsible, and on supporting information which I understand to be true, accurate and complete, I believe the design and construction of the multi-unit groundwater monitoring system that collectively monitors surface impoundments referred to as the Drying Area, Material Storage Runoff Basin, and Metal Cleaning Waste Basin meets the applicable requirements of the CCR Final Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the groundwater monitoring system for the regulated CCR management units referred to as the Drying Area, Material Storage Runoff Basin, and Metal Cleaning Waste Basin has been designed and constructed to meet the applicable requirements of 40 CFR §257.91 and corresponding State of Indiana requirements.



Daniel Sullivan
Indiana Professional Engineer
License #19600309

5.24.2022
Date

May 2022

Certification of Design and Construction of Groundwater Monitoring System (40 CFR §257.91(f))

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

CCR Management Units referred to as Schahfer Landfill Phase V, VI, and VII

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of groundwater monitoring systems for surface impoundments and landfills, do hereby state that I am qualified in the subject matter of CCR groundwater monitoring. I have personally examined and am familiar with the information related to design and construction of groundwater monitoring systems for CCR management units located at the Northern Indiana Public Service Company (NIPSCO) R. M. Schahfer Generating Station, as provided in the Groundwater System Design Manual Revision 4.0 prepared by Golder Associates Inc. and dated May 2022. Based on an inquiry of those individuals immediately responsible, and on supporting information which I understand to be true, accurate and complete, I believe the design and construction of the groundwater monitoring system for the Schahfer Landfill Phase V, VI, and VII meets the applicable requirements of the CCR Final Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the groundwater monitoring system for the regulated CCR management unit referred to as Schahfer Landfill Phase V, VI, and VII has been designed and constructed to meet the applicable requirements of 40 CFR §257.91 and corresponding State of Indiana requirements.



Daniel Sullivan
Indiana Professional Engineer
License #19600309

5·24·2022
Date

APPENDIX D

Soil Borings and Monitoring Well Logs 40 CFR Part §257.103(f)(2)(v)(C)(2)(ii)

BOREHOLE LOG: GAMW-65B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19127906
HOLE DEPTH: 37
DEPTH TO BEDROCK: 36.3

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2173229.48 E: 2968253.82
GROUND SURFACE ELEV.: 665.45
TOP OF CASING ELEV.: 668.67
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD:
DRILL RIG: CME 850 track
START DATE/TIME: 4/17/2020 8:45:00 AM
END DATE/TIME: 4/17/2020 11:50:00 AM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. or Run No.	Type	PID (ppm)	Soil Rec./Att. or Core Rec. %	Soil Sample Description or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
665.0	dark brown fine clayey SILTY SAND		1	SS		1.4 / 2	0.0' to 1.3': (SM) clayey SILTY SAND, fine, low plasticity; dark brown; cohesive, w > PL, soft. 1.3' to 1.4': (SP-SM) SAND, fine, some nonplastic fines; trace coarse sand, trace fine to coarse subrounded gravel; brown; non-cohesive, moist, very loose. SPTs (WOH-WOH-WOH-1)		Cement-bentonite Grout 0-21 ft bgs
	brown fine SAND, trace coarse sand, trace fine to coarse gravel								
	gray-brown fine to medium SILTY SAND		2	SS		1.3 / 2	5' to 5.4': (SM) SILTY SAND, fine to medium, trace coarse sand; gray-brown; non-cohesive, wet, loose. 5.4' to 6.3': (SM) SILTY SAND, fine; dark brown, clay pockets; non-cohesive, moist, loose. SPTs (4-4-4-5)		
660.0	dark brown fine SILTY SAND								
	light brown fine to medium SAND, trace coarse sand, trace fine gravel		3	SS		1.4 / 2	10' to 11.4': (SP) SAND, fine to medium; light brown; non-cohesive, wet, loose; grain size decreases with depth. SPTs (2-4-4-6)		
655.0			4	SS		1.6 / 2	12' to 13.6': (SP) SAND, fine to medium, trace coarse sand, trace fine subrounded gravel; light brown; non-cohesive, wet, loose to compact. SPTs (3-5-6-6)		
			5	SS		1.2 / 2	15.0' to 15.7': (SP) SAND, fine, trace fine subrounded gravel; light brown; non-cohesive, wet, loose to compact. 15.7' to 16.2: (SP) SAND, fine to medium, some coarse sand, trace fine to coarse subrounded gravel; gray; non-cohesive, wet, compact. SPTs (2-4-6-8)		
650.0	gray fine to medium SAND, some coarse sand, trace fine to coarse gravel								
	light brown fine to medium SAND, trace coarse sand, trace fine to coarse gravel		6	SS		2.0 / 2	20.0' to 22.0': (SP) SAND, fine, some medium, trace coarse sand, trace fine to coarse subrounded gravel; light brown; non-coheisve, wet, loose. SPTs (1-2-3-5)		Bentonite Chips 21-23 ft bgs #5 Sand Filter Pack 23-35 ft bgs
645.0									

LITHOLOGY LEGEND

USCS Silty Sand (SM)
Shale
USCS Poorly-graded Sand with Silt (SP-SM)
USCS Poorly-graded Sand (SP)

DRILLING COMPANY: DLZ
DRILLER: Z. Baehr
DRILL RIG: CME 850 track

LOGGED BY: KMC
CHECKED BY: CRH
DATE: 5/7/20

Golder Associates

NIPSCO RMSGS 1648171 - NIPSCO CCR RMSGS - WITH NON-CCR WELLS - COPY.GPJ GOLDER NH 2011.GDT 10/26/20

BOREHOLE LOG: GAMW-65B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19127906
HOLE DEPTH: 37
DEPTH TO BEDROCK: 36.3

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2173229.48 E: 2968253.82
GROUND SURFACE ELEV.: 665.45
TOP OF CASING ELEV.: 668.67
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD:
DRILL RIG: CME 850 track
START DATE/TIME: 4/17/2020 8:45:00 AM
END DATE/TIME: 4/17/2020 11:50:00 AM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. or Run No.	Type	PID (ppm)	Soil Rec./Att. or Core Rec. %	Soil Sample Description or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
640.0	light brown fine to medium SAND, trace coarse sand, trace fine to coarse gravel		7	SS		1.4 / 2	25.0' to 26.4': (SP) SAND, fine to medium, trace coarse sand; light brown; non-cohesive, wet, compact. SPTs (2-8-12-22)		2" PVC Screen slot 0.010 25-35 ft bgs
635.0			8	SS		1.2 / 2	30.0' to 31.2': (SP) SAND, fine to medium, trace coarse sand; light brown; non-cohesive, wet, compact. SPTs (3-8-15-20)		
			9	SS		1.2 / 2	32.0' to 33.2': (SP) SAND, fine to medium, trace coarse sand; light brown; non-cohesive, wet, compact. SPTs (4-9-20-22)		
630.0	highly weathered, light gray CLAYEY SHALE		10	SS		1.4 / 2	35.0' to 36.3': (SP) SAND, fine to medium, trace coarse sand; light borwn; non-cohesive, wet, compact. 36.3' to 36.4: clayey SHALE, light gray, highly weathered; sampled as sandy gravel. SPTs (5-15-27-17)		
625.0									
620.0									

LITHOLOGY LEGEND

USCS Silty Sand (SM)
Shale
USCS Poorly-graded Sand with Silt (SP-SM)
USCS Poorly-graded Sand (SP)

DRILLING COMPANY: DLZ
DRILLER: Z. Baehr
DRILL RIG: CME 850 track

LOGGED BY: KMC
CHECKED BY: CRH
DATE: 5/7/20

Golder Associates

NIPSCO RMSGS 1648171 - NIPSCO CCR RMSGS - WITH NON-CCR WELLS - COPY.GPJ GOLDER NH 2011.GDT 10/26/20

BOREHOLE LOG: GAMW-66B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19127906
HOLE DEPTH: 45.3
DEPTH TO BEDROCK: 44.2

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2173363.62 E: 2967853.2
GROUND SURFACE ELEV.: 669 20
TOP OF CASING ELEV.: 672.99
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD:
DRILL RIG: CME 850 track
START DATE/TIME: 4/21/2020 7:45:00 AM
END DATE/TIME: 4/21/2020 12:00:00 PM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. or Run No.	Type	PID (ppm)	Soil Rec./Att. or Core Rec. %	Soil Sample Description or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
	brown to dark brown fine SAND, some silt, some organics		1	SS		1.0 / 2	0.0' to 0.8': (SP-SM) SAND, fine, some nonplastic fines, some organics (grass), trace fine gravel; brown to dark brown; non-cohesive, moist, very loose.		Bentonite Chips 0-2 ft bgs
	light brown to yellow brown fine SAND, trace coarse sand						0.8'-1': (SP) SAND, fine; light brown to yellow brown; non-cohesive, moist, very loose. SPTs (1-1-1-1)		Cement-bentonite Grout 2-22.5 ft bgs
	brown to dark brown fine SAND, some silt		2	SS		0.9 / 2	2.0' to 2.9': (SP) SAND, fine, trace coarse sand; light brown, dark brown at 2.9'; non-cohesive, moist, loose. SPTs (4-2-2-4)		
665.0	yellow brown to brown fine to medium SAND		3	SS		1.0 / 2	4.0' to 4.5': (SP-SM) SAND, fine, some non-plastic fines; brown to dark brown, lenses of black fine sand, non-cohesive, moist, loose.		
			4	SS		1.6 / 2	4.5' to 5.0': (SP) SAND, fine to medium; brown to yellow brown; non-cohesive, moist, compact. SPTs (3-4-6-10)		
660.0			5	SS		1.0 / 2	6.0' to 6.8': (SP) SAND, fine to medium, trace organics; light gray to brown, pockets of gray/light gray; non-cohesive, moist, compact.		
			6	SS		1.0 / 2	6.8' to 7.6': (SP) SAND, fine to medium; light yellow brown, non-cohesive, moist, compact. SPTs(3-6-8-13)		
			7	SS		1.1 / 2	8.0' to 9.0': (SP) SAND, fine to medium; yellow brown; non-cohesive, moist, compact. SPTs (3-6-10-11)		
655.0			8	SS		1.5 / 2	10.0' to 11.0': (SP) SAND, fine to medium; yellow brown; non-cohesive, wet, compact. SPTs (2-4-8-6)		
	light brown fine to medium SAND, trace coarse sand, trace fine gravel						12.0' to 13.1': (SP) SAND, fine to medium, trace coarse sand; yellow brown; non-cohesive, wet, very loose. SPTs (1-2-2-2)		
			9	SS		1.6 / 2	14.0' to 15.5': (SP) SAND, fine to medium, trace coarse sand; yellow brown; non-cohesive, wet, loose. SPTs (2-2-6-6)		
650.0			10	SS		1.6 / 2	16.0' to 17.6': (SP) SAND, fine to medium, trace coarse sand; light brown; non-cohesive, wet, compact. SPTs (4-7-9-10)		
							18.0' to 19.6': (SP) SAND, fine to medium, trace coarse sand; light brown; non-cohesive, wet, loose. SPTs (3-2-4-6)		
			11	SS		1.0 / 2	20.0' to 21.0': (SP) SAND, fine to medium; light brown; non-cohesive, wet, compact. SPTs (2-6-6-8)		
			12	SS		2.0 / 2	22.0' to 24.0': (SP) SAND, fine to medium, trace coarse sand, trace fine gravel, trace organics; light brown, pocket of clay at 23.4'; non-cohesive, wet, compact.		Bentonite Chips 22.5-29 ft bgs
645.0			13	SS		1.1 / 2	SPTs (4-6-7-7)		

LITHOLOGY LEGEND


USCS Poorly-graded Sand with Silt (SP-SM)


USCS Poorly-graded Sand (SP)


Shale

DRILLING COMPANY: DLZ
DRILLER: Z. Baehr
DRILL RIG: CME 850 track

LOGGED BY: KMC
CHECKED BY: CRH
DATE: 5/7/20

Golder Associates

NIPSCO RMSGS 1648171 - NIPSCO CCR RMSGS - WITH NON-CCR WELLS - COPY.GPJ GOLDER NH 2011.GDT 10/26/20

BOREHOLE LOG: GAMW-66B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19127906
HOLE DEPTH: 45.3
DEPTH TO BEDROCK: 44.2

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2173363.62 E: 2967853.2
GROUND SURFACE ELEV.: 669.20
TOP OF CASING ELEV.: 672.99
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD:
DRILL RIG: CME 850 track
START DATE/TIME: 4/21/2020 7:45:00 AM
END DATE/TIME: 4/21/2020 12:00:00 PM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. or Run No.	Type	PID (ppm)	Soil Rec./Att. or Core Rec. %	Soil Sample Description or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
	light brown fine to medium SAND, trace coarse sand, trace fine gravel		13	SS		1.1 / 2	24.0' to 25.1': (SP) SAND, fine to medium, trace coarse sand, trace fine gravel, trace organics, light brown; non-cohesive, wet, loose. SPTs (2-3-4-4)		
			14	SS		2.0 / 2	26.0' to 28.0': (SP) SAND, fine to medium, trace coarse sand; light brown; non-cohesive, wet, loose. SPTs (2-3-6-8)		
640.0	light brown to gray-brown fine to medium SAND, trace coarse sand, trace fine to coarse gravel		15	SS		1.2 / 2	28.0' to 28.5': (SP) SAND, fine to medium, trace coarse sand, trace fine to coarse subrounded gravel; light brown; non-cohesive, wet, compact.		#5 Sand Filter Pack 29-44 ft bgs
			16	SS		1.9 / 2	28.5' to 29.2': (SP) SAND, fine to medium, some coarse sand, trace fine subrounded gravel; light gray to brown; non-cohesive, wet, compact. SPTs (3-6-12-14)		
			17	SS		1.2 / 2	30.0' to 31.6': (SP) SAND, fine to medium, trace coarse sand, trace fine subrounded gravel; light brown; non-cohesive, wet compact.		
635.0			18	SS		1.9 / 2	31.6' to 31.9': (SP) SAND, fine to medium, some coarse sand, trace fine subrounded gravel; light gray to brown; non-cohesive, wet, compact. SPTs (3-7-7-7)		2" PVC Screen slot 0.010 34-44 ft bgs
			19	SS		0.3 / 2	32.0' to 33.2': (SP) SAND, fine to medium, trace coarse sand; light brown to gray brown; non-cohesive, wet, loose; coarser 32.1-32.4'. SPTs (3-3-6-9)		
630.0			20	SS		1.5 / 2	34.0' to 35.9': (SP) SAND, fine to medium, trace coarse sand; light brown, gray brown from 35.6-36.0'; non-cohesive, wet, compact. SPTs (3-4-7-10)		
			21	SS		1.2 / 2	36.0' to 36.3': (SP) SAND, fine to medium, trace coarse subrounded gravel; light brown to gray brown; non-cohesive, wet, loose. SPTs (4-4-5-7)		
	light gray fine to coarse SAND		22	SS		0.9 / 2	38.0' to 39.5': (SP) SAND, fine to medium, trace coarse sand; light brown to gray brown; non-cohesive, wet, compact. SPTs (3-3-8-7)		
625.0	highly weathered, light gray CLAYEY SHALE		23	SS		1.1 / 1.3	40.0' to 41.2': (SP) SAND, fine to medium, trace coarse sand; light brown to gray brown; non-cohesive, wet, compact. SPTs (3-7-8-10)		
							42.0' to 42.8': (SP) SAND, fine to medium, trace coarse sand; light brown; non-cohesive, wet, compact.		
							42.8' to 42.9': (SW) SAND, fine to coarse, gray shale cobble; light gray; non-cohesive, wet, compact. SPTs (7-7-8-13)		
620.0									

LITHOLOGY LEGEND

USCS Poorly-graded Sand with Silt (SP-SM) | USCS Poorly-graded Sand (SP) | Shale

DRILLING COMPANY: DLZ
DRILLER: Z. Baehr
DRILL RIG: CME 850 track

LOGGED BY: KMC
CHECKED BY: CRH
DATE: 5/7/20

Golder Associates

NIPSCO RMSGS 1648171 - NIPSCO CCR RMSGS - WITH NON-CCR WELLS - COPY.GPJ GOLDER NH 2011.GDT 10/26/20

BOREHOLE LOG: GAMW-66B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19127906
HOLE DEPTH: 45.3
DEPTH TO BEDROCK: 44.2

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2173363.62 E: 2967853.2
GROUND SURFACE ELEV.: 669 20
TOP OF CASING ELEV.: 672.99
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD:
DRILL RIG: CME 850 track
START DATE/TIME: 4/21/2020 7:45:00 AM
END DATE/TIME: 4/21/2020 12:00:00 PM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. or Run No.	Type	PID (ppm)	Soil Rec./Att. or Core Rec. %	Soil Sample Description or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
							44.0' to 44.2': (SW) SAND, fine to coarse; light gray; non-cohesive, wet, compact. 44.2' to 45.1': (CL) sandy CLAY; light gray, platey, medium to high dry strength; cohesive, w < PL, stiff to very stiff. SPTs (5-28-50/3")		
615.0									
610.0									
605.0									
600.0									
595.0									

LITHOLOGY LEGEND

USCS Poorly-graded Sand with Silt (SP-SM)

USCS Poorly-graded Sand (SP)

Shale

DRILLING COMPANY: DLZ
DRILLER: Z. Baehr
DRILL RIG: CME 850 track

LOGGED BY: KMC
CHECKED BY: CRH
DATE: 5/7/20

Golder Associates

NIPSCO RMSGS 1648171 - NIPSCO CCR RMSGS - WITH NON-CCR WELLS - COPY.GPJ GOLDER NH 2011.GDT 10/26/20

BOREHOLE LOG: GAMW-67B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19127906
HOLE DEPTH: 43
DEPTH TO BEDROCK: 40.7

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2174213.3 E: 2967604.35
GROUND SURFACE ELEV.: 664.65
TOP OF CASING ELEV.: 667.97
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD:
DRILL RIG: CME 850 track
START DATE/TIME: 4/20/2020 12:05:00 PM
END DATE/TIME: 4/20/2020 4:05:00 PM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. Or Run No.	Type	PID (ppm)	Soil Rec./Att. Or Core Rec. %	Soil Sample Description Or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
	brown to dark brown fine SILTY SAND		1	SS		0.8 / 2	0.0' to 0.2': (SM) SILTY SAND, fine, trace organics (grass); brown to dark brown; non-cohesive, moist, very loose.		Bentonite Chips 0-2 ft bgs
	light gray fine to coarse SAND, some fine to coarse gravel						0.2' to 0.7': (SP) SAND, fine to coarse, some fine to coarse subrounded gravel; light gray; non-cohesive, moist, loose.		Cement-bentonite Grout 2-19 ft bgs
	yellow brown fine SAND						0.7' to 0.8': (SP) SAND, fine, trace medium to coarse sand; yellow brown; non-cohesive, moist, loose. SPTs(2-10-7-7)		
	dark brown fine SAND		2	SS		0.9 / 2	5.0' to 5.9': (SP) SAND, fine; dark brown; non-cohesive, moist, loose. SPTs (4-3-5-5)		
660.0									
	light brown fine to medium SAND, trace coarse sand		3	SS		0.7 / 2	10.0' to 10.7': (SP) SAND, fine, some medium sand; light brown; non-cohesive, wet, very loose. SPTs (1-1-2-3)		
655.0			4	SS		1.4 / 2	12.0' to 13.4': (SP) SAND, fine to medium, trace coarse sand, trace fine subrounded gravel; light brown; non-cohesive, wet, loose.		
650.0			5	SS		0.9 / 2	15.0' to 15.9': (SP) SAND, fine to medium, trace coarse sand, light brown; non-cohesive, wet, compact. SPTs (2-5-7-6)		
645.0			6	SS		2.0 / 2	20.0' to 22.0': (SP) SAND, fine to medium, trace coarse sand, light brown; non-cohesive, wet, loose. SPTs (1-1-4-5)		Bentonite Chips 19-28 ft bgs
640.0									

LITHOLOGY LEGEND

USCS Silty Sand (SM)
Shale
USCS Poorly-graded Sand (SP)
USCS Well-graded Sand (SW)

DRILLING COMPANY: DLZ
DRILLER: Z. Baehr
DRILL RIG: CME 850 track

LOGGED BY: KMC
CHECKED BY: CRH
DATE: 5/7/20

Golder Associates

NIPSCO RMSGS 1648171 - NIPSCO CCR RMSGS - WITH NON-CCR WELLS - COPY.GPJ GOLDER NH 2011.GDT 10/26/20

BOREHOLE LOG: GAMW-67B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19127906
HOLE DEPTH: 43
DEPTH TO BEDROCK: 40.7

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2174213.3 E: 2967604.35
GROUND SURFACE ELEV.: 664.65
TOP OF CASING ELEV.: 667.97
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD:
DRILL RIG: CME 850 track
START DATE/TIME: 4/20/2020 12:05:00 PM
END DATE/TIME: 4/20/2020 4:05:00 PM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. or Run No.	Type	PID (ppm)	Soil Rec./Att. or Core Rec. %	Soil Sample Description or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
	light brown fine to medium SAND, trace coarse sand		7	SS		1.4 / 2	25.0' to 26.0': (SP) SAND, fine medium, trace coarse sand; light brown; non-cohesive, wet, compact.		
	light gray to brown fine to coarse SAND						26.0' to 26.4': (SW) SAND, fine to coarse, trace round fine to coarse gravel; light gray brown; non-cohesive, wet, compact; coarser 26.3-26.4'. SPTs (6-10-16-18)		
	light brown fine to medium SAND, trace fine gravel								#5 Sand Filter Pack 28-40.5 ft bgs
635.0			8	SS		2.0 / 2	30.0' to 32.0': (SP) SAND, fine to medium, trace coarse sand, trace round to subrounded fine gravel; light brown; non-cohesive, wet, compact. SPTs (6-8-8-10)		2" PVC Screen slot 0.010 30.5-40.5 ft bgs
	light gray to brown, medium to coarse SAND, some fine sand, trace fine gravel		9	SS		0.6 / 2	32.0' to 32.6': (SW) SAND, medium to coarse, some fine sand, trace fine subrounded gravel; light gray to brown; non-cohesive, wet, compact; coarser 32.3-32.6', light brown fine sand at 32.6'. SPTs (4-8-8-14)		
630.0	light brown fine to medium SAND, trace coarse sand, trace fine to coarse gravel, lenses of medium to coarse sand		10	SS		1.5 / 2	35.0' to 36.5': (SP) SAND, fine to medium, trace coarse sand, trace fine subrounded gravel; light brown; non-cohesive, wet, very dense. SPTs (15-20-33-42)		
			11	SS		2.0 / 2	37.0' to 39.0': (SP) SAND, fine to medium, trace coarse sand, trace fine to coarse round to subrounded gravel; light brown, lenses of medium to coarse sand; non-cohesive, wet, compact. SPTs (7-12-17-17)		
625.0	highly weathered, light gray CLAYEY SHALE and light brown fine to coarse sand		12	SS		1.4 / 2	39.0' to 40.0': (SP) SAND, fine to medium, trace coarse sand; light brown; non-cohesive, wet, compact.		
	highly weathered, light gray CLAYEY SHALE		13	SS		1.2 / 2	40.0' to 40.4': clayey SHALE, light gray, highly weathered, platey, fine to coarse sand and fine to coarse subrounded gravel; non-cohesive, wet, compact. SPTs (10-14-20-12)		
							41.0' to 42.2': (CL), SILTY CLAY, light gray; cohesive, w~PL, firm to stiff. SPTs (3-4-6-14)		
620.0									
615.0									

LITHOLOGY LEGEND



USCS Silty Sand (SM)
Shale



USCS Poorly-graded Sand (SP)



USCS Well-graded Sand (SW)

DRILLING COMPANY: DLZ
DRILLER: Z. Baehr
DRILL RIG: CME 850 track

LOGGED BY: KMC
CHECKED BY: CRH
DATE: 5/7/20

Golder Associates

NIPSCO RMSGS 1648171 - NIPSCO CCR RMSGS - WITH NON-CCR WELLS - COPY.GPJ GOLDER NH 2011.GDT 10/26/20

BOREHOLE LOG: GAMW-68

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19121567
HOLE DEPTH: 18
DEPTH TO BEDROCK: N/A

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2168555.544 E: 2970328.36
GROUND SURFACE ELEV.: 665 95
TOP OF CASING ELEV.: 665.53
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD: N/A
DRILL RIG: Geoprobe 7822 DT
START DATE/TIME: 8/27/2020 3:25:00 PM
END DATE/TIME: 8/27/2020 6:00:00 PM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. or Run No.	Type	PID (ppm)	Soil Rec./Att. or Core Rec. %	Soil Sample Description or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
665.0	brown fine SAND, some silt, trace organics		1	SS		1.8 / 2	0-0.5': (SP-SM) SAND, fine, some organics (roots), brown, non cohesive, dry, loose 0.5-1.5': (SP) SAND, fine, light dark, brown, non cohesive, moist, loose 1.5-1.8': (SP) SAND, fine, trace organics (roots), light and dark, brown, non cohesive, moist, loose SPTs (6-6-6-7)		Completed as flush mount Bentonite Chips 1-4 ft bgs
	light and dark brown fine SAND, trace organics								
	orange and brown fine SAND		2	SS		1.4 / 2	2-2.5': (SP) SAND, fine, trace organics (roots), light and dark brown, non cohesive, moist, loose 2.5-2.8': (SP) SAND, fine, orange and brown, non cohesive, moist, loose 2.8-3.4': (SP) SAND, fine, light brown, non cohesive, moist, loose SPTs (3-3-4-3)		1/4" Coated Bentonite Pellets 4-6 ft bgs
	light brown to brown fine to medium SAND		3	SS		1.2 / 2			
660.0			4	SS		1.2 / 2	4-5.2': (SP) SAND, fine to medium, light brown, non cohesive, moist, loose, wet at 4.4 ft-bgs SPTs (3-4-4-3)		#5 Sand Filter Pack 6-17 ft bgs 2" PVC Screen slot 0.010 7-17 ft bgs
			5	SS		1 / 2	6-7.2': (SP) SAND, fine to medium, light brown to brown, non cohesive, wet, compact SPTs (4-6-12-16)		
			6	SS		1.6 / 2	8-9': (SP) SAND, fine to medium, trace coarse, brown, non cohesive, wet, compact SPTs (2-5-8-11) 10-11': (SP) SAND, fine to medium, some coarse sand and fine round gravel from 11 to 11.3 ft bgs; brown, non cohesive, wet, compact		
655.0			7	SS		2 / 2	11.3-11.6': (SP) SAND, fine to medium, trace coarse, brown, non cohesive, wet, compact SPTs (4-7-8-11)		
			8	SS		0.7 / 2	12-14': (SP) SAND, medium, some fine and coarse sand, brown, non cohesive, wet, compact SPTs (3-7-10-12)		
650.0			9	SS		2 / 2	14-14.6': (SP) SAND, medium, some fine and coarse sand, trace fine-coarse subrounded gravel, brown, non cohesive, wet, compact 14.6-14.7': (SP) SAND, fine, brown, non cohesive, wet, compact SPTs (2-3-7-12) 16-17.5': (SP) SAND, fine, some medium, brown, non cohesive, wet, loose 17.5-18': (SP) SAND, fine, brown, non cohesive, wet, compact SPTs (2-5-8-14)		Native sand collapsed to 17 ft bgs
645.0									

LITHOLOGY LEGEND

USCS Poorly-graded Sand with Silt (SP-SM)

USCS Poorly-graded Sand (SP)

DRILLING COMPANY: Strata Earth Services, LLC
DRILLER: Scott Komen
DRILL RIG: Geoprobe 7822 DT

LOGGED BY: KMC
CHECKED BY: KJ
DATE: 10/19/20

Golder Associates

NIPSCO RMSGS 1648171 - NIPSCO CCR RMSGS - WITH NON-CCR WELLS - COPY.GPJ GOLDER NH 2011.GDT 10/26/20

BOREHOLE LOG: GAMW-68B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19121567
HOLE DEPTH: 34.7
DEPTH TO BEDROCK: 34.7

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2168557.418 E: 2970325.081
GROUND SURFACE ELEV.: 665.97
TOP OF CASING ELEV.: 665.72
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD: N/A
DRILL RIG: Geoprobe 7822 DT
START DATE/TIME: 8/26/2020 11:20:00 AM
END DATE/TIME: 8/27/2020 3:15:00 PM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. or Run No.	Type	PID (ppm)	Soil Rec./Att. or Core Rec. %	Soil Sample Description or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
665.0	brown fine SAND, some silt, trace organics light and dark brown fine SAND, trace organics		1	SS		1.8 / 2	0-0.5': (SP-SM) SAND, fine, some organics (roots), brown, non cohesive, dry, loose 0.5-1.5': (SP) SAND, fine, light dark, brown, non cohesive, moist, loose 1.5-1.8': (SP) SAND, fine, trace organics (roots), light and dark, brown, non cohesive, moist, loose SPTs (6-6-6-7)		Completed as flush mount Bentonite chips 1-6 ft bgs
	orange and brown fine SAND light brown to brown fine to medium SAND		2	SS		1.4 / 2	2-2.5': (SP) SAND, fine, trace organics (roots), light and dark brown, non cohesive, moist, loose 2.5-2.8': (SP) SAND, fine, orange and brown, non cohesive, moist, loose 2.8-3.4': (SP) SAND, fine, light brown, non cohesive, moist, loose SPTs (3-3-4-3)		
660.0			3	SS		1.2 / 2	4-5.2': (SP) SAND, fine to medium, light brown, non cohesive, moist, loose, wet at 4.4 ft-bgs SPTs (3-4-4-3)		Cement Grout 6-20 ft bgs
			4	SS		1.2 / 2	6-7.2': (SP) SAND, fine to medium, light brown to brown, non cohesive, wet, compact SPTs (4-6-12-16)		
			5	SS		1 / 2	8-9': (SP) SAND, fine to medium, trace coarse, brown, non cohesive, wet, compact SPTs (2-5-8-11)		
655.0			6	SS		1.6 / 2	10-11': (SP) SAND, fine to medium, some coarse sand and fine round gravel from 11 to 11.3 ft bgs; brown, non cohesive, wet, compact 11.3-11.6': (SP) SAND, fine to medium, trace coarse, brown, non cohesive, wet, compact SPTs (4-7-8-11)		
			7	SS		2 / 2	12-14': (SP) SAND, medium, some fine and coarse sand, brown, non cohesive, wet, compact SPTs (3-7-10-12)		
			8	SS		0.7 / 2	14-14.6': (SP) SAND, medium, some fine and coarse sand, trace fine-coarse subrounded gravel, brown, non cohesive, wet, compact 14.6-14.7': (SP) SAND, fine, brown, non cohesive, wet, compact SPTs (2-3-7-12)		
650.0			9	SS		2 / 2	16-17.5': (SP) SAND, fine, some medium, brown, non cohesive, wet, loose 17.5-18': (SP) SAND, fine, brown, non cohesive, wet, compact SPTs (2-5-8-14)		
			10	SS		2 / 2	18-19.4': (SP) SAND, fine to medium, brown, non cohesive, wet, loose 19.4-19.7': (ML/SP) SILT and SAND, fine, brown, non cohesive, wet, loose 19.7-20': (SP) SAND, fine to medium, brown-gray, non cohesive, wet, loose SPTs (2-4-4-7)		1/4" Coated Bentonite Pellets 20-22 ft bgs
	brown SILT and fine SAND brown to gray-brown fine to medium SAND, some coarse sand, trace fine gravel		11	SS		1.8 / 2	20-21': (SP) SAND, fine to medium, brown-gray, non cohesive, wet, loose 21-21.8': (SW) SAND, fine to coarse, trace fine sub rounded gravel, gray-brown, non cohesive, wet, loose SPTs (2-1-2-7)		#5 Sand Filter Pack 22-34.5 ft bgs
645.0			12	SS		2 / 2			
			13	SS		2 / 2			2" PVC Screen slot

LITHOLOGY LEGEND

USCS Poorly-graded Sand with Silt (SP-SM)
Shale
USCS Poorly-graded Sand (SP)
USCS Silt (ML)

DRILLING COMPANY: Strata Earth Services, LLC
DRILLER: Scott Komen
DRILL RIG: Geoprobe 7822 DT

LOGGED BY: KMC
CHECKED BY: KJ
DATE: 10/19/20

Golder Associates

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BOREHOLE LOG: GAMW-68B

PROJECT: NIPSCO LLC Schahfer
PROJECT NO.: 19121567
HOLE DEPTH: 34.7
DEPTH TO BEDROCK: 34.7

BOREHOLE LOCATION: Wheatfield, IN
COORDINATES: N: 2168557.418 E: 2970325.081
GROUND SURFACE ELEV.: 665 97
TOP OF CASING ELEV.: 665.72
DATUM: Indiana West Zone NAD 83

DRILLING METHOD: Hollow-stem auger
CORING METHOD: N/A
DRILL RIG: Geoprobe 7822 DT
START DATE/TIME: 8/26/2020 11:20:00 AM
END DATE/TIME: 8/27/2020 3:15:00 PM

Depth Elev.	LITHOLOGY DESCRIPTION	Graphical Log	SAMPLE INFORMATION: Sample No. Or Run No.	Type	PID (ppm)	Soil Rec./Att. Or Core Rec. %	Soil Sample Description Or Discontinuity Data (Depth, Dip, Angle From Core Axis, Type, and Surface Description)	Well Graphic	Well Construction Information
640.0	brown to gray-brown fine to medium SAND, some coarse sand, trace fine gravel		13	SS		2 / 2	22-22.8': (SW) SAND, fine to coarse, trace fine sub rounded gravel, gray-brown, non cohesive, wet, loose		0.010 24.5-34.5 ft bgs
			14	SS		2 / 2	22.8-23.4': (SP) SAND, fine to medium, some coarse sand, trace fine rounded gravel, brown, non cohesive, wet, compact 23.4-24': (SP) SAND, fine to medium, trace coarse sand, trace fine rounded gravel, gray-brown, non cohesive, wet, compact SPTs (5-12-15-16)		
			15	SS		2 / 2	24-26': (SP) SAND, fine to medium, trace coarse sand, trace fine sub rounded gravel, gray-brown, non cohesive, wet, compact SPTs (4-9-16-16)		
635.0			16	SS		1.5 / 2	26-26.3': (SW) SAND, fine to coarse, gray-brown, non cohesive, wet, loose 26.3-28': (SP) SAND, fine to medium, some coarse sand, trace fine rounded gravel, non cohesive, wet, compact to dense SPTs (7-14-19-21)		
			17	SS		1.5 / 2	28-30': (SP) SAND, fine to medium, some coarse sand, trace fine rounded gravel, non cohesive, wet, compact to dense SPTs (9-14-22-19)		
	slightly weathered, weak, friable light gray SHALE		18	SS		0.7 / 0.7	30-31.5': (SW) SAND, fine to coarse, trace fine rounded gravel, gray-brown, non cohesive, wet, loose. Increasing grain size with depth SPTs (2-3-4-10)		
630.0							32-33.5': (SP) SAND, medium, some fine, some coarse sand, non cohesive, wet, compact SPTs (6-8-13-23)		
							34-34.5': (SP) SAND, medium, some fine, some coarse sand, non cohesive, wet, compact 34.5-34.7': Slightly weathered, weak, friable light gray shale		
625.0									
620.0									

LITHOLOGY LEGEND

USCS Poorly-graded Sand with Silt (SP-SM)
Shale
USCS Poorly-graded Sand (SP)
USCS Silt (ML)

DRILLING COMPANY: Strata Earth Services, LLC
DRILLER: Scott Komen
DRILL RIG: Geoprobe 7822 DT

LOGGED BY: KMC
CHECKED BY: KJ
DATE: 10/19/20

Golder Associates

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APPENDIX E

Analytical Data 40 CFR Part §257.103(f)(2)(v)(C)(3)

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW01			GAMW01B			GAMW03		
Sample Date		2020-10-21	2021-04-14	2021-09-16	2020-10-21	2021-04-14	2021-09-16	2020-10-22	2021-04-14	2021-09-17
Sample Type		N	N	N	N	N	N	N	N	N
Chemical Name	Unit									
CCR Appendix III										
Boron	mg/L	0.71	0.78	0.24	0.34	0.35	0.29	0.18	0.22	0.13
Calcium	mg/L	89.6	95.2	76.7	104	103	112	78.3	90.3	70.2
Chloride	mg/L	11.3	10.1	5.9	19.9	20.8	18.6	6.6	4.3	4.2
Fluoride	mg/L	0.36	0.29	0.36 J-	0.12	0.076	0.094 J-	0.14	0.13	0.2
pH	SU	7.53	7.11	6.61	7.25	6.96	6.5	6.9	6.77	6.9
Sulfate	mg/L	100	157	42.3	74.2	85.2	69.3	70.3	97.5	40.2
Total Dissolved Solids	mg/L	387	574	294	423	450	443	317	390	298
CCR Appendix IV										
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.019	0.012	0.02	0.001 U	0.001 U	0.001 U	0.014	0.0094	0.019
Barium	mg/L	0.059	0.051	0.049	0.16	0.17	0.17	0.086	0.074	0.08
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.0013	0.0019	0.001	0.001 U	0.001	0.001 U	0.0012	0.0055	0.001 U
Fluoride	mg/L	0.36	0.29	0.36 J-	0.12	0.076	0.094 J-	0.14	0.13	0.2
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.0087	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.019	0.011	0.0076	0.001 U	0.001 U	0.001 U	0.01	0.011	0.0084
Radium Total	pci/l		0.642 U			2.02			0.158 U	
Selenium	mg/L	0.001 U	0.01	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Sample Parameters										
DO	mg/L	0.39	0.6	0.49	0.43	0.51	0.51	0.54	1.47	0.27
ORP	millivolts	-35.4	-37 2	-240.2	-73.8	-88	-217.6	2.6	-33.4	-225.9
pH	SU	7.53	7.11	6.61	7.25	6.96	6.5	6.9	6.77	6.9
SC	uS/cm	656	721	524	747	752	705	576	605	479
TEMP	deg c	16.2	9.7	18.23	13.3	12.1	14.36	15.9	9.5	16.85
TURB	ntu	2.81	4.06	3.51	1.01	3.19	2.19	4.09	5.99	2.8

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is es imated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW03B			GAMW12			GAMW12B			
Sample Date		2020-10-22	2021-04-15	2021-09-17	2020-10-20	2021-04-15	2021-09-16	2020-10-20	2021-04-15		2021-09-16
Sample Type		N	N	N	N	N	N	N	FD	N	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	0.25	0.25	0.27	0.1 U	0.1 U	0.1 U	0.36	0.29	0.31	0.32
Calcium	mg/L	92.7	96.4	102	84.8	87	80.7	108	103	104	107
Chloride	mg/L	17	20.1	23.1	6.3	2.3	3.2	23.1	20.5	20.8	20.6
Fluoride	mg/L	0.23	0.2	0.23	0.23	0.16	0.19 J-	0.098	0.079	0.082	0.079 J-
pH	SU	7.32	7.03	6.97	6.69	7.31	6.49	7.11		7.55	6.99
Sulfate	mg/L	66.8	58	78.6	49.7	9.2	24.2	79.9	63.8	66.5	57.5
Total Dissolved Solids	mg/L	372	400	439	313	336	325	432	435	430	451
CCR Appendix IV											
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0.001 U	0.02	0.012	0.043	0.001 U	0.001 U	0.001 U	0.001 U
Barium	mg/L	0.1	0.11	0.12	0.11	0.095	0.094	0.13	0.13	0.13	0.14
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.002	0.0025	0.0028	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.23	0.2	0.23	0.23	0.16	0.19 J-	0.098	0.079	0.082	0.079 J-
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0072	0.0051	0.0066	0.003	0.0028	0.0041	0.0017	0.0012	0.0012	0.0013
Radium Total	pci/l		1.08 U			1.1 U			1.65	2.42	
Selenium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Sample Parameters											
DO	mg/L	0.39	0.95	0.28	0.54	0.2	0.28	0.36		0.13	0.46
ORP	millivolts	-11.2	-81 8	-255.4	-4.4	-90.7	-191.9	1		-107.1	-265.3
pH	SU	7.32	7.03	6.97	6.69	7.31	6.49	7.11		7.55	6.99
SC	uS/cm	670	695	634	586	583	625	734		709	704
TEMP	deg c	13.2	11.8	13.22	16.2	9.04	19.11	14		11.67	14.81
TURB	ntu	3.56	4.08	3.19	3.89	4.78	4.53	2.35		3.58	3.64

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW13			GAMW13B			GAMW14			
Sample Date		2020-10-20	2021-04-19	2021-09-17	2020-10-20	2021-04-19	2021-09-17	2020-10-20		2021-04-19	2021-09-17
Sample Type		N	N	N	N	N	N	FD	N	N	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	0.16	0.16	0.19	0.67	0.71	0.6	0.14	0.14	0.29	0 2
Calcium	mg/L	77.9	95.6	71.2	78.6	82.7	77.8	73.8	71.7	67.7	82.6
Chloride	mg/L	9.3	4.3	10.5	28.8	28.3	26	3.6	3.6	11.3	10.6
Fluoride	mg/L	0.31	0.27	0.31	0.26	0.31	0.25	0.21	0.21	0.26	0 26
pH	SU	6.57	6.95	6.67	7.47	7.73	7.32		6.36	7.03	6.61
Sulfate	mg/L	22	48.6	49.3	143	146	137	8.4	8.5	40.6	31.8
Total Dissolved Solids	mg/L	291	355	317	383	376	395	259	240	270	330
CCR Appendix IV											
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Arsenic	mg/L	0.01	0.027	0.0076	0.0011	0.0012	0.001	0.029	0.029	0.018	0 039
Barium	mg/L	0.1	0.11	0.08	0.083	0.081	0.077	0.053	0.053	0.061	0 081
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U
Cobalt	mg/L	0.001 U	0.0012	0.001 U	0.001 U	0.001 U	0.001 U	0.023	0.023	0.017	0 024
Fluoride	mg/L	0.31	0.27	0.31	0.26	0.31	0.25	0.21	0.21	0.26	0 26
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0 008 U
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0.0039	0.0096	0.004	0.017	0.016	0.016	0.0087	0.0088	0.0073	0 0077
Radium Total	pci/l		1.06 U			0.82 U				0.883 U	
Selenium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Sample Parameters											
DO	mg/L	0.69	0.46	0.29	0.37	0.23	0.32		0.49	0.2	0 29
ORP	millivolts	-18.5	-16 8	-155.2	-31.1	-120.6	-259.6		61.1	-31.7	-234.5
pH	SU	6.57	6.95	6.67	7.47	7.73	7.32		6.36	7.03	6.61
SC	uS/cm	582	461	580	636	527	568		478.2	377	568
TEMP	deg c	16.6	9.5	18.84	14.1	11.97	14.15		15.5	10.2	16.83
TURB	ntu	3.73	3.79	2.17	4.1	3.92	0.5		3.3	4.19	0 85

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW14B				GAMW42			GAMW42B		
Sample Date		2020-10-20	2021-04-19		2021-09-17	2020-10-15	2021-04-23	2021-09-14	2020-10-15	2021-04-23	2021-09-14
Sample Type		N	FD	N	N	N	N	N	N	N	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	4.6	2.8	2.8	2.7	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Calcium	mg/L	171	146	143	112	42.6	47.1	59.9	53.2	57.9	62.6
Chloride	mg/L	138	112	108	85.2	2.8	4.2	11.4	5.6	8.6	10.3
Fluoride	mg/L	0.3	0.29	0.29	0.28	0.21	0.17 J-	0.19	0.15	0.15 J-	0.12
pH	SU	7.53		7.71	7.39	7.22	7.62	7	7.73	7.72	8
Sulfate	mg/L	1570	1330	1350	841	23.6	29.9	66.5	29.3	37.7	31.8
Total Dissolved Solids	mg/L	2630	1730	1740	1660	178	148	253	207	193	241
CCR Appendix IV											
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.0015	0.0012	0.0011	0.001 U	0.001 U	0.001 U
Barium	mg/L	0.11	0.08	0.08	0.059	0.019	0.018	0.023	0.016	0.016	0.021
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.3	0.29	0.29	0.28	0.21	0.17 J-	0.19	0.15	0.15 J-	0.12
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.0093	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.048	0.028	0.028	0.04	0.0021	0.0022	0.0033	0.0026	0.0029	0.0027
Radium Total	pci/l		1.92	1.85			0 U			0.853 U	
Selenium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Sample Parameters											
DO	mg/L	0.36		0.29	0.42	0.37	0.59	0.17	0.34	0.49	0.15
ORP	millivolts	-13.2		-103.5	-193.7	-13.5	-80 9	-191	-58.7	-125.5	-261
pH	SU	7.53		7.71	7.39	7.22	7.62	7	7.73	7.72	8
SC	uS/cm	3573		2128	2053	280.5	326.1	413	352.2	407	414
TEMP	deg c	13.7		12.37	13.98	13.7	9.9	14.9	12.4	11.8	13.1
TURB	ntu	3.56		1.86	1.1	2.28	2.56	1.76	2.25	4.87	3.98

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW42C			GAMW43			GAMW43B			
Sample Date		2020-10-15	2021-04-23	2021-09-15	2020-10-15	2021-04-23	2021-09-14	2020-10-16	2021-04-27		2021-09-14
Sample Type		N	N	N	N	N	N	N	FD	N	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	0.74	0.69	0.62	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Calcium	mg/L	48	48.6	53.9	29.5	28	32.6	39.3	41.2	40.4	38.2
Chloride	mg/L	5.5	6.3	8.3	0.9	0.53	0.85	1.7	1.7	1.7	1.8
Fluoride	mg/L	0.2	0.2 J-	0.22	0.12	0.13 J-	0.11	0.15	0.19	0.19	0.15
pH	SU	7.29	7.59	7.36	7.08	7.22	7.22	8.03		8.04	7.64
Sulfate	mg/L	3.9	4.4	4.3	24.8	30	28.4	23.8	28.9 J+	27.9 J+	22.2
Total Dissolved Solids	mg/L	223	203	254	126	86	137	149	145	151	137
CCR Appendix IV											
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0.001 U	0.003	0.0016	0.0028	0.001 U	0.001 U	0.001 U	0.001 U
Barium	mg/L	0.01	0.0092	0.0089	0.019	0.019	0.026	0.011	0.012	0.011	0.011
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.0043	0.0024	0.0022	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.2	0.2 J-	0.22	0.12	0.13 J-	0.11	0.15	0.19	0.19	0.15
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.028	0.032	0.024	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0031	0.0026	0.0021	0.0019	0.0018	0.002	0.0022	0.0023	0.0021	0.0024
Radium Total	pci/l		0.802 U			0.568 U			0.985 U	0.731 U	
Selenium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Sample Parameters											
DO	mg/L	0.29	0.43	0.12	0.36	0.7	0.64	0.38		0.51	0.27
ORP	millivolts	-25.6	-123.3	-231	65.1	35.1	-329	-60.8		-108.7	-323.9
pH	SU	7.29	7.59	7.36	7.08	7.22	7.22	8.03		8.04	7.64
SC	uS/cm	409	455.1	475	245.5	209	226	244.6		282	191
TEMP	deg c	11.9	11.8	12.7	14.8	9.7	17.01	12.4		11.4	12.88
TURB	ntu	8.56	7.69	5.86	3.69	4.3	2.99	2.13		2.38	1.37

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW44			GAMW44B				GAMW51			
Sample Date		2020-10-16	2021-04-27	2021-09-15	2020-10-16		2021-04-27	2021-09-15	2020-10-27	2021-04-21	2021-09-29	
Sample Type		N	N	N	FD	N	N	N	N	N	FD	N
Chemical Name	Unit											
CCR Appendix III												
Boron	mg/L	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.92	0.43	0 51	0.5
Calcium	mg/L	28.1	21.5	20.2	33.8	34.4	31.2	31.7	180	144	148	147
Chloride	mg/L	1.9	2.3	1.7	3.5	3.6	1.6	1.5	7.1	1.5	2 3	2.3
Fluoride	mg/L	0.054	0.19	0.13	0.12	0.11	0.14	0.18	0.42	0.26	0 34	0.34
pH	SU	5.87	6.21	6.21		8.24	8.22	7.81	7.1	7.19		7.04
Sulfate	mg/L	44.6	63.9 J+	44.8	9.8	10.4	12.3 J+	7.5	323	196	191	193
Total Dissolved Solids	mg/L	153	165	136	118	126	85	113	755	604	597	600
CCR Appendix IV												
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Arsenic	mg/L	0.026	0.095	0.052	0.001 U	0.001 U	0.001 U	0.001 U	0.0021	0.0016	0 0016	0.0016
Barium	mg/L	0.025	0.018	0.02	0.0092	0.0092	0.0084	0.0082	0.1	0.1	0.11	0.11
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.0034	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U
Cobalt	mg/L	0.0033	0.0026	0.0029	0.001 U	0.001 U	0.001 U	0.001 U	0.0022	0.0033	0 0031	0.0031
Fluoride	mg/L	0.054	0.19	0.13	0.12	0.11	0.14	0.18	0.42	0.26	0 34	0.34
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.010	0.008 U	0 012	0.012
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Molybdenum	mg/L	0.0029	0.0044	0.004	0.0017	0.0017	0.0022	0.002	0.031	0.011	0 0092	0.0098
Radium Total	pci/l		0.365 U				1.03 U			1.23 U		
Selenium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Sample Parameters												
DO	mg/L	0.9	1.07	0.83		0.37	0.5	0.36	0.83	0.48		0.27
ORP	millivolts	109.9	-8.1	-294.6		-67.9	-125.8	-318	-86	-100.6		0.197
pH	SU	5.87	6.21	6.21		8.24	8.22	7.81	7.1	7.19		7.04
SC	uS/cm	267.1	257.8	192		212.3	210.9	158	910	873		937
TEMP	deg c	14.2	11.2	16.11		11.7	11.5	12.16	14.2	11.1		15.9
TURB	ntu	3.22	4.66	2.04		1.3	2.15	1.19	3.48	4.2		4.12

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW51B			GAMW57			GAMW57B		
Sample Date		2020-10-27	2021-04-21	2021-09-29	2020-10-16	2021-04-23	2021-09-15	2020-10-16	2021-04-23	2021-09-15
Sample Type		N	N	N	N	N	N	N	N	N
Chemical Name	Unit									
CCR Appendix III										
Boron	mg/L	7.5	7.2	7	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.13
Calcium	mg/L	256	261	282	23.4	13.9	21.8	44.9	43.1	47.5
Chloride	mg/L	62.2	54.8	53.2	1.2	1.6	1	10.7	11.2	12.4
Fluoride	mg/L	0.92	0.45	0.82	0.05 U	0.05 UJ	0.073	0.11	0.13 J-	0.17
pH	SU	8.07	8.11	7.83	8.88	6.22	8.03	7.9	7.95	7.33
Sulfate	mg/L	1610	1490	1480	28.4	38	25.8	24	19.1	24.4
Total Dissolved Solids	mg/L	2360	2180 J	2270	104	58	101	179	150	205
CCR Appendix IV										
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.0034	0.004	0.0044	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Barium	mg/L	0.068	0.072	0.077	0.0059	0.014	0.0055	0.021	0.02	0.022
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.0014	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.92	0.45	0.82	0.05 U	0.05 UJ	0.073	0.11	0.13 J-	0.17
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.063	0.071	0.078	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U
Mercury	mg/L	0.0002 UJ	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.17	0.16	0.15	0.0051	0.0011	0.003	0.0049	0.0028	0.0067
Radium Total	pci/l		3.57			0.194 U			0.368 U	
Selenium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Sample Parameters										
DO	mg/L	2.12	0.55	0.29	5.35	4.93	6.33	0.35	0.22	0.37
ORP	millivolts	-152.7	-108.7	0.246	147	111.6	-297.7	-51.1	-132.7	-316.7
pH	SU	8.07	8.11	7.83	8.88	6.22	8.03	7.9	7.95	7.33
SC	uS/cm	2352	3094	303.9	177	124	136	317.8	291	284
TEMP	deg c	12.9	12.4	14.2	12.2	10.25	12.45	11.4	11.2	11.54
TURB	ntu	1.65	1.82	1.43	3.9	2.7	2.63	2.58	3.04	1.65

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW58			GAMW58B				GAMW59		
Sample Date		2020-10-19	2021-04-23	2021-09-15	2020-10-19	2021-04-23	2021-09-15		2020-10-28	2021-04-21	2021-09-29
Sample Type		N	N	N	N	N	FD	N	N	N	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	1.7	0.89	1
Calcium	mg/L	10.8	7.3	10.9	39.5	37.8	29.2	38.6	239	209	217
Chloride	mg/L	1.1	0.95	1.1	4.3	3.6	2.1	4	5 J-	11.3	21.1
Fluoride	mg/L	0.38	0.22 J-	0.35	0.14	0.15 J-	0.12	0.19	0.59	0.42	0.7
pH	SU	5.37	4.4	5.87	8.12	7.92		7.32	7.49	7.53	7.26
Sulfate	mg/L	39.6	45	38.9	26.7	24.9	32.1	23.6	692	473	434
Total Dissolved Solids	mg/L	67	44 J	82	148	124	135	161	2310	756	866
CCR Appendix IV											
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0017	0.0012	0.002
Barium	mg/L	0.039	0.059	0.041	0.016	0.015	0.0044	0.015	0.076	0.048	0.055
Beryllium	mg/L	0.00076	0.0012	0.00075	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.00025	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.0083	0.01	0.0093	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.38	0.22 J-	0.35	0.14	0.15 J-	0.12	0.19	0.59	0.42	0.7
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.015	0.012	0.018
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.001 U	0.001 U	0.001 U	0.0034	0.0034	0.001 U	0.0041	0.048	0.03	0.045
Radium Total	pci/l		1.95			0.703 U				1.17 U	
Selenium	mg/L	0.001 U	0.001 U	0.0025	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Sample Parameters											
DO	mg/L	1.52	4.1	0.98	0.39	0.3		0.73	0.43	0.21	0.28
ORP	millivolts	207.7	291.1	-314	-69.1	-140.4		-298.9	-36.1	-105.5	0.202
pH	SU	5.37	4.4	5.87	8.12	7.92		7.32	7.49	7.53	7.26
SC	uS/cm	121.9	110	102	280.7	252		218	1595	1038	125.5
TEMP	deg c	12.7	9.27	13.67	11	10.84		11.37	16.9	11.28	22.2
TURB	ntu	1.45	0.84	1.27	3.67	2.96		2.66	3.57	4.8	4.52

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW59B			GAMW60				GAMW60B		
Sample Date		2020-10-28	2021-04-22	2021-09-29	2020-10-28		2021-04-21	2021-09-24	2020-10-28	2021-04-21	2021-09-24
Sample Type		N	N	N	FD	N	N	N	N	N	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	6.4	5.4	6.3	1.1	1.1	1	0.97	7.3	6.5	7 3
Calcium	mg/L	208	292	253	285	293	343	379	304	351	309
Chloride	mg/L	46.7 J-	52	51.3	18 J-	18.1 J-	17.2	16.5	17.4 J-	14.3	69.6
Fluoride	mg/L	0.56	0.45	0.53	0.57	0.57	0.3	0.51	0.53	0.34	1.1
pH	SU	8.15	7.6	7.57		7.02	7.05	7.01	8.66	7.74	7.76
Sulfate	mg/L	1130	1180	1180	654	656	748	1050	1160	1140	443
Total Dissolved Solids	mg/L	1790	1860	1950	1120	1130	1300	1540	1700	2710	1440
CCR Appendix IV											
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Arsenic	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Barium	mg/L	0.039	0.037	0.04	0.028	0.028	0.027	0.031	0.071	0.077	0 063
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.0012	0.0011	0.0013	0.002	0.001 U	0.001 U	0 001 U
Fluoride	mg/L	0.56	0.45	0.53	0.57	0.57	0.3	0.51	0.53	0.34	1.1
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Lithium	mg/L	0.014	0.017	0.019	0.008 U	0.008 U	0.012	0.015	0.0086	0.034	0 045
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0.052	0.044	0.05	0.024	0.024	0.013	0.015	0.49	0.35	0 37
Radium Total	pci/l		1.76				1.29 U			3.02	
Selenium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0017	0.001 U	0.001 U	0.001 U	0 001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Sample Parameters											
DO	mg/L	0.32	0.49	0.29		0.51	1.34	0.29	0.34	0.56	0 25
ORP	millivolts	-64.1	-119.4	0.231		217.1	84.3	0.56	-63.5	-101.3	0 238
pH	SU	8.15	7.6	7.57		7.02	7.05	7.01	8.66	7.74	7.76
SC	uS/cm	2638	2650	264.7		1580	1747	187.2	2216	2181	209.8
TEMP	deg c	14.2	13.1	17.4		16.7	11.5	20.7	13.7	12.2	14.9
TURB	ntu	2.7	1.46	1.58		0.94	0.9	1.56	3.43	1.04	2 05

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-1: Analytical Data- Waste Diposal Area
NIPSCO R. M. Schahfer Generating Station
Wheatfield, Indiana

		Location	GAMW68			GAMW68B		
		Sample Date	2020-10-29	2021-04-22	2021-09-17	2020-10-29	2021-04-22	2021-09-17
		Sample Type	N	N	N	N	N	N
Chemical Name	Unit							
CCR Appendix III								
Boron	mg/L	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	
Calcium	mg/L	62.7	60.7	66.4	44.4	43 5	44.7	
Chloride	mg/L	24.7	22.8	20.4	20.3	19 5	18.4	
Fluoride	mg/L	0.2	0.16	0.28	0.15	0.1	0.2	
pH	SU	8.32	7.82	7.75	8.09	8 35	7.99	
Sulfate	mg/L	77.1	68.6	81.3	80.7	62 5	63.5	
Total Dissolved Solids	mg/L	301	320	315	256	2040	242	
CCR Appendix IV								
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	
Arsenic	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	
Barium	mg/L	0.078	0.085	0.1	0.11	0.11	0.1	
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	
Fluoride	mg/L	0.2	0.16	0.28	0.15	0.1	0.2	
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	
Lithium	mg/L	0.008 U	0.008 U	0.0081	0.008 U	0 008 U	0.008 U	
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	
Molybdenum	mg/L	0.0034	0.0035	0.0045	0.0022	0 0022	0.0027	
Radium Total	pci/l		0.285 U			1 35 U		
Selenium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	
Sample Parameters								
DO	mg/L	0.5	0.51	0.28	1.41	0 5	0.21	
ORP	millivolts	157.2	-39.2	0.187	-163	-154.3	0.216	
pH	SU	8.32	7.82	7.75	8.09	8 35	7.99	
SC	uS/cm	532	490	515	336	410.1	413	
TEMP	deg c	14.5	9.7	16	12.5	11.6	13.5	
TURB	ntu	1.05	2.02	3.99	1.65	3 57	3.56	

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter
detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.

Appendix E-2: Analytical Results - MSRB, MCWB, and Drying Area
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	Unit	GAMW04				GAMW07				GAMW07B		
		2020-10-22	2021-04-15	2021-09-23	2021-09-23	2020-10-27	2021-04-16	2021-09-21	2021-09-21	2020-10-27	2021-04-16	2021-09-23
		N	N	FD	N	N	N	FD	N	N	N	N
Appendix III Parameters												
Boron	mg/L	0.4	1.1	0 36	0.35	1.1	0.81	0.91	0 85	5.3	5.9	6.9
Calcium	mg/L	90.3	178	108	107	213	198	215	212	282	327	373
Chloride	mg/L	4 9	6.2	3.7	3.6	12.3	11.7	11 9	12	21	38	60.3
Fluoride	mg/L	0 59	0.2	0 35	0.35	0.88	0 66	0.85	0 85	1.2	0.79	0 95
pH	SU	7.79	7.26		7.4	6.98	7.14		7.14	8.26	7.94	7 58
Sulfate	mg/L	82.1	375	116	121	439	352	362	359	1040	1010	1060
Total Dissolved Solids	mg/L	299	726	381	380	911	846	887	894	1590	1700	1790
Appendix IV Parameters												
Antimony	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U
Arsenic	mg/L	0.0055	0.0019	0 0041	0.0036	0.001 U	0 001 U	0.0012	0 0013	0.0021	0.0022	0 0022
Barium	mg/L	0.054	0.079	0 057	0.056	0.057	0 046	0.053	0 052	0.036	0.041	0 037
Beryllium	mg/L	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U
Cadmium	mg/L	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Chromium	mg/L	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U
Cobalt	mg/L	0 001 U	0.0016	0 001 U	0.001 U	0.0074	0 0056	0.0061	0.006	0.001 U	0.0011	0 001 U
Fluoride	mg/L	0 59	0.2	0 35	0.35	0.88	0 66	0.85	0 85	1.2	0.79	0 95
Lead	mg/L	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Lithium	mg/L	0 008 U	0.008 U	0.008 U	0.008 U	0.008 U	0 008 U	0.0091	0.0088	0.008 U	0.008 U	0 013
Mercury	mg/L	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0 01	0.066	0.015	0.016	0.0094	0 0078	0.01	0.01	0.036	0.029	0 023
Radium 226 + 228	pCi/L		0.659 U				1 29 U				2.16	
Selenium	mg/L	0 001 U	0.0033	0.001 U	0.001 U	0.0013	0 0069	0.0044	0.0039	0.001 U	0.001 U	0 001 U
Thallium	mg/L	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Field Parameters												
Dissolved Oxygen	mg/L	0 37	1.71		0.31	0.47	0 39		0.25	0.32	0.23	0 26
Oxidation Reduction Potential	millivolts	-7	-29		0.149	259.4	55.5		0.1	-73 9	-124.1	0 224
pH	SU	7.79	7.26		7.4	6.98	7.14		7.14	8.26	7.94	7 58
Specific Conductivity	uS/cm	521	950		595	1250	1064		123	2055	1970	222.4
Temperature	deg C	16.2	9.24		15.9	15.5	11.06		17	13.3	12.2	14.7
Turbidity	NTU	1 9	4.67		7.06	1.51	3.4		2.65	8.02	2.6	4 84

Notes:
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nepholometic Turbidity Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
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"O" = Indicates te result was identified as an outlier and removed from the data set.

Appendix E-2: Analytical Results - MSRB, MCWB, and Drying Area
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	Unit	GAMW08			GAMW08B			GAMW09			GAMW09B			
		2020-10-26	2021-04-22	2021-09-24	2020-10-23	2021-04-22	2021-09-24	2020-10-23	2021-04-20	2021-09-23	2020-10-23	2021-04-20		2021-09-23
		N	N	N	N	N	N	N	N	N	N	FD	N	N
Appendix III Parameters														
Boron	mg/L	0.52	0.89	1.1	7	7.7	8.4	3.7	3 5	3.8	6.3	6.1	6.2	6.7
Calcium	mg/L	168	266	260	203	198	235	192	168	227	162	169	171	163
Chloride	mg/L	26.4	50	14.9	134	178	179	59 8	41.6	54.7	107	102	94	113
Fluoride	mg/L	0.71	0.97	0.44	0.93	0.9	0.73	0.31	0 26	0.34	1.4	1.4	1.4	1 3
pH	SU	6.87	7.04	7 04	7.95	7.49	7.44	7.92	8.48 O	7.51	8		10.49 O	7 56
Sulfate	mg/L	229	477	841	769	751	1060	397	418	509	540	582 J	1040 J	773
Total Dissolved Solids	mg/L	636	1120	2380	1250	1620	2040	796	659	1040	1010	1030	982	1430
Appendix IV Parameters														
Antimony	mg/L	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Arsenic	mg/L	0 001 U	0.001 U	0 0013	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.0034	0 0033	0.0034	0 0031
Barium	mg/L	0 056	0.07	0 076	0.031	0.039	0 046	0.046	0 037	0.053	0.039	0 036	0.035	0 059
Beryllium	mg/L	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Cadmium	mg/L	0 0002 U	0.0002 U	0 00022	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Chromium	mg/L	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U
Cobalt	mg/L	0 037	0.017	0 015	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Fluoride	mg/L	0.71	0.97	0.44	0.93	0.9	0.73	0.31	0 26	0.34	1.4	1.4	1.4	1 3
Lead	mg/L	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Lithium	mg/L	0 008 U	0.012	0 015	0.008 U	0.012	0 014	0.008 U	0 008 U	0.008 U	0.008 U	0 008 U	0.008 U	0 0095
Mercury	mg/L	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0 013	0.034	0 043	0.0096	0.011	0 011	0.051	0 04	0.058	0.011	0 012	0.012	0 015
Radium 226 + 228	pCi/L		1.57			2.53			0 649 U			0 924 U	1.67 U	
Selenium	mg/L	0 0011	0.01	0 005	0.001 U	0.001 U	0 001 U	0.0082	0 0053	0.0079	0.001 U	0 001 U	0.001 U	0 001 U
Thallium	mg/L	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Field Parameters														
Dissolved Oxygen	mg/L	0.44	1	0 35	0.33	0.29	0 27	3.43	3.42	6.2	0.34		0.2	0 31
Oxidation Reduction Potential	millivolts	300	22	19.3	-51 2	-120.1	0 218	337.2	-20.6	0.2	-29.9		-113.1	0 204
pH	SU	6 87	7.04	7 04	7.95	7.49	7.44	7.92	8.48	7.51	8		10.49	7 56
Specific Conductivity	uS/cm	1040	1432	167 2	1917	2151	286.3	1218	970	138.4	1513		1459	201 2
Temperature	deg C	16.3	11 2	18.8	14	13	15.2	17 8	10.6	18.7	15.4		13.4	16.4
Turbidity	NTU	2 39	1.99	1.48	3.85	2.78	3 9	4	1 02	2.95	2.76		4.26	3 02

Notes:
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nepholometic Turbidity Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
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"O" = Indicates te result was identified as an outlier and removed from the data set.

Appendix E-2: Analytical Results - MSRB, MCWB, and Drying Area
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	Unit	GAMW15			GAMW15B				GAMW16R				GAMW16BR	
		2020-10-27	2021-04-16	2021-09-22	2020-10-27	2021-04-16		2021-09-22	2020-10-29		2021-04-22	2021-09-21	2020-10-26	2021-04-22
		N	N	N	N	FD	N	N	FD	N	N	N	N	N
Appendix III Parameters														
Boron	mg/L	0.47 O	8 O	3 5	42.5 O	32.7 O	32 5 O	28.1	9.6 O	9.7 O	3.6 O	4.1	41 O	24.8 O
Calcium	mg/L	122 O	160 O	136	446 O	335 O	321 O	352	312 O	313 O	410 O	275	439 O	380 O
Chloride	mg/L	95.7 O	99 3 O	49.8	613 O	372 O	396 O	269	155 O	155 O	81.1 O	112	566 O	331 O
Fluoride	mg/L	0.85 O	0.76 O	0.77 J-	0.41 O	0.37 O	0.35 O	0.44 J-	0.5 O	0.5 O	0.39 O	0.57	0.68 O	0.41 O
pH	SU	7.02 O	7.1 O	7.12	6.6 O		7.15 O	7.08		7.21 O	7.16 O	7.1	7.2 O	7 21 O
Sulfate	mg/L	153 O	371 O	265	468 O	596 O	643 O	900	720 O	698 O	1060 O	633	570 O	723 O
Total Dissolved Solids	mg/L	556 O	770 O	675	2170 O	1740 O	1870 O	2030	1600 O	1540 O	1850 O	1370	2170 O	2080 O
Appendix IV Parameters														
Antimony	mg/L	0.001 UO	0.001 UO	0 001 U	0.001 UO	0.001 UO	0.001 UO	0.001 U	0.001 UO	0.001 UO	0.001 UO	0.001 U	0.001 UO	0 001 UO
Arsenic	mg/L	0.078 O	0.046 O	0 09	0.001 UO	0.001 UO	0.001 UO	0.001 U	0.0059 O	0.0058 O	0.0042 O	0.0088	0.001 UO	0 001 UO
Barium	mg/L	0.053 O	0.058 O	0 05	0.21 O	0.18 O	0.18 O	0.17	0.097 O	0.097 O	0.074 O	0.06	0.091 O	0 073 O
Beryllium	mg/L	0.0002 UO	0.0002 UO	0 0002 U	0.0002 UO	0.0002 UO	0.0002 UO	0.0002 U	0.0002 U	0.0002 UO	0.0002 UO	0.0002 U	0.0002 UO	0 0002 UO
Cadmium	mg/L	0.0002 UO	0.0002 UO	0 0002 U	0.0002 UO	0.0002 UO	0.0002 UO	0.0002 U	0.0002 U	0.0002 UO	0.0002 UO	0.0002 U	0.0002 UO	0 0002 UO
Chromium	mg/L	0.002 UO	0.002 UO	0 002 U	0.002 UO	0.002 UO	0.002 UO	0.002 U	0.002 UO	0.002 UO	0.002 UO	0.002 U	0.002 UO	0 002 UO
Cobalt	mg/L	0.0019 O	0.003 O	0 0021	0.001 UO	0.0011 O	0.001 O	0.001 U	0.0039 O	0.004 O	0.0064 O	0.0038	0.001 UO	0 001 UO
Fluoride	mg/L	0.85 O	0.76 O	0.77 J-	0.41 O	0.37 O	0.35 O	0.44 J-	0.5 O	0.5 O	0.39 O	0.57	0.68 O	0.41 O
Lead	mg/L	0.001 UO	0.001 UO	0 001 U	0.001 UO	0.001 UO	0.001 UO	0.001 U	0.001 UO	0.001 UO	0.001 UO	0.001 U	0.001 UO	0 001 UO
Lithium	mg/L	0.008 UO	0.008 UO	0 01	0.015 O	0.011 O	0.012 O	0.026	0.008 UO	0.008 UO	0.008 UO	0.011	0.013 O	0 033 O
Mercury	mg/L	0.0002 UO	0.0002 UO	0 0002 U	0.0002 UO	0.0002 UO	0.0002 UO	0.0002 U	0.0002 U	0.0002 UO	0.0002 UO	0.0002 U	0.0002 UO	0 0002 UO
Molybdenum	mg/L	0.031 O	0.028 O	0 027	0.001 UO	0.0012 O	0.0012 O	0.0029	0.019 O	0.019 O	0.027 O	0.019	0.001 UO	0 001 UO
Radium 226 + 228	pCi/L		0.191 UO			2.96 O	2.15 O				0.968 UO			2 06 O
Selenium	mg/L	0.001 UO	0.0036 O	0 001 U	0.001 UO	0.001 UO	0.001 UO	0.001 U	0.042 O	0.043 O	0.001 UO	0.001 U	0.001 UO	0 001 UO
Thallium	mg/L	0.001 UO	0.001 UO	0 001 U	0.001 UO	0.001 UO	0.001 UO	0.001 U	0.001 UO	0.001 UO	0.001 UO	0.001 U	0.001 UO	0 001 UO
Field Parameters														
Dissolved Oxygen	mg/L	0.3	0.2	0 28	0.36		0.26	0.32		0.48	0.27	0.29	0.47	0 28
Oxidation Reduction Potential	millivolts	-45.8	-64.1	0.193	-7.2		-65.7	0.164		39.1	-78.9	0.208	-21.2	-95.1
pH	SU	7.02	7.1	7.12	6.6		7.15	7.08		7.21	7.16	7.1	7.2	7 21
Specific Conductivity	uS/cm	941	1153	104 8	3077		2491	286.6		2098	2025	185	3281	2510
Temperature	deg C	22.3	14 38	19.2	19.8		17 6	17		20.4	15.08	25	17.5	16.38
Turbidity	NTU	4.15	9.82	6 36	2.06		1.1	1.7		2.69	4.65	1.79	8.93	7 82

Notes:
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nepholometic Turbidity Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
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"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"O" = Indicates te result was identified as an outlier and removed from the data set.

Appendix E-2: Analytical Results - MSRB, MCWB, and Drying Area
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	Unit	
		2021-09-21
		N
Appendix III Parameters		
Boron	mg/L	25.3
Calcium	mg/L	265
Chloride	mg/L	516
Fluoride	mg/L	2.6
pH	SU	7.5
Sulfate	mg/L	2970
Total Dissolved Solids	mg/L	5970
Appendix IV Parameters		
Antimony	mg/L	0.001 U
Arsenic	mg/L	0.0042
Barium	mg/L	0.041
Beryllium	mg/L	0.0002 U
Cadmium	mg/L	0.0002 U
Chromium	mg/L	0.0023
Cobalt	mg/L	0.001 U
Fluoride	mg/L	2.6
Lead	mg/L	0.001 U
Lithium	mg/L	0.031
Mercury	mg/L	0.0002 U
Molybdenum	mg/L	0.043
Radium 226 + 228	pCi/L	
Selenium	mg/L	0.0013
Thallium	mg/L	0.001 U
Field Parameters		
Dissolved Oxygen	mg/L	0.31
Oxidation Reduction Potential	millivolts	0.212
pH	SU	7.5
Specific Conductivity	uS/cm	795.5
Temperature	deg C	19.5
Turbidity	NTU	20.19

Notes:
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nepholometic Turbidity Units

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"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
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"O" = Indicates te result was identified as an outlier and removed from the data set.

Appendix E-2: Analytical Results - MSRB, MCWB, and Drying Area
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	Unit	GAMW17			GAMW17B			GAMW18			GAMW18B			
		2020-10-26	2021-04-14	2021-09-22	2020-10-26	2021-04-14	2021-09-22	2020-10-23	2021-04-20	2021-09-16	2020-10-23	2021-04-21	2021-09-17	
		N	N	N	N	N	N	N	N	N	N	N	FD	N
Appendix III Parameters														
Boron	mg/L	4.6	4.3	12.5	7.8	10.2	7.3	3.6	3.1	5.9	9	8.4	8.2	8 2
Calcium	mg/L	144	139	346	152	164	155	341	436	456	301	317	325	323
Chloride	mg/L	79.4	79	175	118	135	105	54 8	40.3	97	114	112	85 8	86.3
Fluoride	mg/L	1.5	1.2	1 3 J-	0.53	0.3	0.49 J-	0.19	0.16	0.16 J-	0.8	0.35	0.6	0 6
pH	SU	7.38	7.3	7.16	8.21	7.84	7.6	7.1	10.36 O	7.1	7.43	7 51		7 34
Sulfate	mg/L	396	358	964	404	549	365	765	1310	1160	1240	1260	1100	1120
Total Dissolved Solids	mg/L	726	806	1890	866	1250	928	1450	1440	2020	1830	3340	1930	2010
Appendix IV Parameters														
Antimony	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Arsenic	mg/L	0.0027	0.0024	0 0027	0.0022	0.0012	0 0021	0.001 U	0 001 U	0.001 U	0.0025	0 0025	0.0028	0 0027
Barium	mg/L	0.071	0.059	0.17	0.061	0.094	0 053	0.053	0 044	0.057	0.032	0 041	0.028	0 029
Beryllium	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Chromium	mg/L	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U
Cobalt	mg/L	0.001 U	0.0012	0 001 U	0.001 U	0.0015	0 001 U	0.001 U	0 001 U	0.0011	0.001 U	0 001 U	0.001 U	0 001 U
Fluoride	mg/L	1.5	1.2	1 3 J-	0.53	0.3	0.49 J-	0.19	0.16	0.16 J-	0.8	0.35	0.6	0 6
Lead	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Lithium	mg/L	0.008 U	0.008 U	0 021	0.008 U	0.008 U	0 008 U	0.008 U	0 008 U	0.011	0.03	0 037	0.031	0 028
Mercury	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0.013	0.012	0 01	0.0082	0.0058	0 012	0.079	0 082	0.14	0.05	0 074	0.03	0 031
Radium 226 + 228	pCi/L		1.05 U			1.47 U			0 538 U			2.14		
Selenium	mg/L	0.0047	0.01	0 0036	0.001 U	0.001 U	0.001 U	0.034	0 042	0.028	0.001 U	0 001 U	0.001 U	0 001 U
Thallium	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Field Parameters														
Dissolved Oxygen	mg/L	1.21	2.52	3.75	0.4	0.21	0.29	6.58	6 82	5.39	0.35	0.25		0.19
Oxidation Reduction Potential	millivolts	234.5	29 8	10.2	-55 5	-117 5	0.215	320.6	-64.3	56.8	15.9	-104.5		0.192
pH	SU	7.38	7.3	7.16	8.21	7.84	7.6	7.1	10.36	7.1	7.43	7.51		7 34
Specific Conductivity	uS/cm	1188	1152	236 5	1396	1778	138.8	1921	1699	245.9	2646	2494		247 3
Temperature	deg C	20.4	11 95	21.8	16.9	15.19	16.7	17.4	10.29	21.4	15.2	12.15		15.8
Turbidity	NTU	3.85	1.25	1.47	4	1.44	4.22	2.84	2 84	3.74	3.28	4.19		4 59

Notes:
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nepholometic Turbidity Units

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"O" = Indicates te result was identified as an outlier and removed from the data set.

Appendix E-2: Analytical Results - MSRB, MCWB, and Drying Area
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	Unit	GAMW46			GAMW46B			GAMW52			GAMW52B		
		2020-10-19	2021-04-27	2021-09-15	2020-10-19	2021-04-27	2021-09-15	2020-10-22	2021-04-16	2021-09-30	2020-10-23	2021-04-16	2021-09-30
		N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters													
Boron	mg/L	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1	0.1	0.1	1.7	1.2	0.64
Calcium	mg/L	22.7	29.1	29.3	51	54.3	51	71.4	59.9	62.5	142	94.9	120
Chloride	mg/L	1.3	2.1	2.1	4.6	5.5	5.4	49.1	18.7	15.9	248	131	135
Fluoride	mg/L	0.05 U	0.078	0.11	0.058	0.077	0.12	0.26	0 22	0.31	0.26	0 24	0.38
pH	SU	8.67	8.36	8.16	7.97	7.69	7.73	7.82	7 5	7.6	7.29	7.46	7.57
Sulfate	mg/L	23.9	33 J+	31.8	60.5	61.6 J+	55.3	58 6	55.8	50.1	259	181	156
Total Dissolved Solids	mg/L	85	112	137	197	190	243	336	269	276	982	673	667
Appendix IV Parameters													
Antimony	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 0011	0.0011
Barium	mg/L	0.0046	0.005	0 0044	0.023	0.025	0 023	0.014	0 011	0.014	0.23	0.15	0.14
Beryllium	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U
Fluoride	mg/L	0.05 U	0.078	0.11	0.058	0.077	0.12	0.26	0 22	0.31	0.26	0 24	0.38
Lead	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0 008 U	0.008 U	0.008 U	0 008 U	0.008 U	0 008 U	0.008 U	0.008 U	0 008 U	0.008 U
Mercury	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Molybdenum	mg/L	0.001 U	0.001 U	0 001 U	0.0022	0.0018	0 0018	0.0022	0 0021	0.0025	0.015	0 013	0.011
Radium 226 + 228	pCi/L		1.28 U			1.65 U			0 23 U			1.05 U	
Selenium	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.0011	0 0011	0.001 U	0.001 U	0 001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U
Field Parameters													
Dissolved Oxygen	mg/L	4.78	1.59	1 26	1.1	0.64	0.2	0.35	0 91	0.56	1.02	0.42	0.28
Oxidation Reduction Potential	millivolts	127	109.8	-130	-40 5	-101 3	-241	227.8	-23.1	0.38	-141 6	-123.5	0.241
pH	SU	8.67	8.36	8.16	7.97	7.69	7.73	7.82	7 5	7.6	7.29	7.46	7.57
Specific Conductivity	uS/cm	175.1	238.2	238	358.9	351	388	641	545	501	1400	1159	110.4
Temperature	deg C	13.5	10.7	15.1	11.7	11.37	12.2	19	12	20	17.1	15.8	18
Turbidity	NTU	3.02	1.73	3 21	4.69	4.58	4.3	1.09	1.79	1.39	2.36	3 9	1.27

Notes:
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nepholometic Turbidity Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"O" = Indicates te result was identified as an outlier and removed from the data set.

Appendix E-2: Analytical Results - MSRB, MCWB, and Drying Area
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	Unit	GAMW53				GAMW53B			GAMW54			GAMW54B		
		2020-10-23		2021-04-16	2021-09-30	2020-10-23	2021-04-16	2021-09-30	2020-10-23	2021-04-19	2021-10-01	2020-10-23	2021-04-19	2021-10-01
		FD	N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters														
Boron	mg/L	0.1 U	0.1 U	0.1 U	0.1 U	2.5	1.9	2.7	0.72	0.5	0.63	2.2	3.1	3.1
Calcium	mg/L	16.9	17	17.5	28 3	136	142	128	154	164	114	195	236	190
Chloride	mg/L	1.8	2	2.4	2.7	84.6	84.8	66.4	50.3	53 9	24.6	49.2	83.9	70.4
Fluoride	mg/L	0.05 U	0.05 U	0 05 U	0.05 U	0.58	0.4	0.46	0 28	0.2	0.3	0.59	0.53	0 52
pH	SU		5.88	5.76	6.17	7.39	7.28	7.48	6 21	6.52	6.82	6.97	7.3	7 36
Sulfate	mg/L	26.6	28 2	35.2	49.4	327	304	295	341	492	191	438	891	501
Total Dissolved Solids	mg/L	89	99	97	147	730	748	802	689	735	506	878	1120	1030
Appendix IV Parameters														
Antimony	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 0011	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Arsenic	mg/L	0.0014	0.0014	0 0012	0.0012	0.001 U	0.001 U	0.0014	0 0038	0.0075	0.024	0.0042	0.0044	0 004
Barium	mg/L	0.022	0.023	0 027	0.033	0.061	0.067	0.051	0 068	0.071	0.048	0.054	0.063	0 056
Beryllium	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Chromium	mg/L	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U
Cobalt	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.0011	0.001 U	0.001 U	0.001 U	0 001 U
Fluoride	mg/L	0.05 U	0.05 U	0 05 U	0.05 U	0.58	0.4	0.46	0 28	0.2	0.3	0.59	0.53	0 52
Lead	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Lithium	mg/L	0.008 U	0.008 U	0 008 U	0.008 U	0.008 U	0.008 U	0.008 U	0 008 U	0.008 U	0.008 U	0.008 U	0.008 U	0 008 U
Mercury	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0.0066	0.0066	0 0052	0.0097	0.011	0.015	0.011	0 023	0.011	0.025	0.029	0.017	0 025
Radium 226 + 228	pCi/L			0 U			1.21 U			0.694 U			1.43	
Selenium	mg/L	0.001 U	0.001 U	0 001 U	0.0019	0.001 U	0.001 U	0.001 U	0 0029	0.0044	0.001 U	0.001 U	0.001 U	0 001 U
Thallium	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Field Parameters														
Dissolved Oxygen	mg/L		1.16	1 99	0.92	0.65	0.39	0.24	1 04	0.68	0.29	0.72	0.45	0 26
Oxidation Reduction Potential	millivolts		122.8	111.7	94 9	-111 8	-104	-232.6	67.5	81 2	-153 9	-143.2	-105.3	-211.7
pH	SU		5.88	5.76	6.17	7.39	7.28	7.48	6 21	6.52	6.82	6.97	7.3	7 36
Specific Conductivity	uS/cm		144	173	204	1091	1227	125.6	875	1097	782	1105	1626	149.4
Temperature	deg C		19	13	20.4	19.5	17.6	20	17	11 8	20.1	16.2	14.3	17.3
Turbidity	NTU		2.19	4 56	4.51	4.03	3.27	3.62	2.45	6.79	3.79	4.6	6.74	3 54

Notes:
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nepholometic Turbidity Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"O" = Indicates te result was identified as an outlier and removed from the data set.

Appendix E-2: Analytical Results - MSRB, MCWB, and Drying Area
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	Unit	GAMW55R			GAMW55B			GAMW56			GAMW56B		
		2020-10-28	2021-04-20	2021-10-01	2020-10-28	2021-04-20	2021-10-01	2020-10-28	2021-04-20	2021-10-04	2020-10-28	2021-04-21	2021-10-04
		N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters													
Boron	mg/L	0.95	0.87	1.7	10.8	9.9	8.3	0.3	0.23	0.19	2	1.6	1.4
Calcium	mg/L	170	237	197	226	254	205	111	130	108	138	157	160
Chloride	mg/L	48.2 J-	51.4	44.1	120 J-	120	79.4	3.2 J-	2.9	1.7	45.7 J-	70 8	73.7
Fluoride	mg/L	0.63	0.46	0 51	0.28	0.3	0.3	0.83	0.05 U	1	0 51	0.41	0.46
pH	SU	7.45	7.6	7 27	7.56	7.7	7.44	7.07	7.05	7.09	7.47	7.55	7.34
Sulfate	mg/L	351	867	389	720	985	496	49.6	57.6	64.8	275	277	268
Total Dissolved Solids	mg/L	789	842	948	1380	1370	1120	390	480	379	696	738	802
Appendix IV Parameters													
Antimony	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.0059	0.007	0.0018	0 001 U	0.001 U	0.001 U
Barium	mg/L	0.038	0.032	0 038	0.06	0.061	0.05	0.044	0.042	0.04	0 066	0.071	0.081
Beryllium	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.01	0.016	0.0045	0 001 U	0.001 U	0.001 U
Fluoride	mg/L	0.63	0.46	0 51	0.28	0.3	0.3	0.83	0.05 U	1	0 51	0.41	0.46
Lead	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0 01	0.008 U	0.008 U	0.012	0.008 U	0.008 U	0.008 U	0 008 U	0.008 U	0.0091
Mercury	mg/L	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.025	0.013	0 017	0.0062	0.0068	0.0058	0.0093	0.0083	0.011	0 0075	0.0074	0.0062
Radium 226 + 228	pCi/L		1.47 R			1.49 U			0.222 U			2.97	
Selenium	mg/L	0.0028	0.0029	0 0046	0.001 U	0.001 U	0.001 U	0.001 U	0.0011	0.001 U	0 001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Field Parameters													
Dissolved Oxygen	mg/L	2.5	1.19	0.47	1.37	0.65	0.26	1.88	1	0.37	1.48	0.23	0.29
Oxidation Reduction Potential	millivolts	12.8	32 3	-16.8	-130.1	-97.3	-213.9	-64.4	65.9	-133.7	-123.9	-110.5	-214.1
pH	SU	7.45	7.6	7 27	7.56	7.7	7.44	7.07	7.05	7.09	7.47	7.55	7.34
Specific Conductivity	uS/cm	994	1319	139.1	1588	1896	162.3	560	740	655	772	1100	124.4
Temperature	deg C	17.6	11 3	20.6	17.2	15.3	18.7	14.7	9	17.2	12.9	12	14.3
Turbidity	NTU	1.2	2.35	1 59	3.22	4.78	4.48	0.83	2.67	3.48	2 39	6.72	4.65

Notes:
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nepholometic Turbidity Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"O" = Indicates te result was identified as an outlier and removed from the data set.

Appendix E-3 Analytical Data - Landfill Phases V, VI, and VII
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW20				GAMW24			
Sample Date		2020-09-16	2021-04-12	2021-09-13		2020-09-15	2021-04-12	2021-09-13	
Sample Type		FD	N	N	N	N	N	FD	N
Chemical Name	Unit								
CCR Appendix III									
Boron	mg/L	3.4	3.4	2.8	3.7	0.1 U	0.1 U	0.12	0.1 U
Calcium	mg/L	188	188	164	249	91	80.2	83.3	86.8
Chloride	mg/L	7.9	7.8	11.4	11.2	28 J+	18.5	21.6	22
Fluoride	mg/L	0.24	0.22	0.19	0.22	0 099	0 083	0.067	0.15
pH	SU		7.07	7.17	7.2	7 3	7 68		7.34
Sulfate	mg/L	552	549	500	529	88	70	70	69.6
Total Dissolved Solids	mg/L	1110	1140	1050	1170	389	318	351	349
Field Parameters									
Dissolved Oxygen	mg/L		0.1	0.87	0.12	0 21	0.14		0.14
Oxidation-Reduction Potential	millivolts		-103.9	-94	0.188	-76.9	-14.8		0.129
pH	SU		7.07	7.17	7.2	7 3	7 68		7.34
Specific Conductance	uS/cm		1314	1530	163.7	530	561		609
Temperature	deg c		17.3	10 6	17.1	17	9 95		16.8
Turbidity	ntu		5.1	2.71	5.22	3 87	4 6		4.84

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter

"U" = Indicates the result is not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result was estimated.
"J+" = Indicates the result was estimated and maybe biased high.
"J-" = Indicates the result was estimated and maybe biased low.

Appendix E-3 Analytical Data - Landfill Phases V, VI, and VII
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW24B			GAMW25			GAMW25B			
Sample Date		2020-09-15	2021-04-13	2021-09-13	2020-09-15	2021-04-12	2021-09-10	2020-09-16	2021-04-12		2021-09-10
Sample Type		N	N	N	N	N	N	N	FD	N	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	0.1 U	0.1 U	0.1 U	0.18	0.17	0.15	0.13	0.13	0.13	0.13
Calcium	mg/L	50.8	46.9	51.3	82.8	76.4	72.5	83	94	94.2	97.4
Chloride	mg/L	6.6 J+	3 3	4.1	5.6 J+	4.3	2.7	6.8	8.7	8 6	7.2
Fluoride	mg/L	0.14	0.12	0.19	1.1	1.1	1.2 J-	0.21	0.18	0.18	0.13 J-
pH	SU	7.96	7 58	7 91	7.23	7.27	7.4	7.35		7.16	7.36
Sulfate	mg/L	37	26.7	24	57.7	44 9	48.5	77	67.2	67.2	88 9
Total Dissolved Solids	mg/L	210	184	190	334	288	329	348	378	377	417
Field Parameters											
Dissolved Oxygen	mg/L	0.19	0 65	0 24	1.57	3.81	1.65	0.18		0.49	0.27
Oxidation-Reduction Potential	millivolts	-152.7	-114 6	0 23	-10.1	154.4	96.6	-130.4		-127	0.185
pH	SU	7.96	7 58	7 91	7.23	7.27	7.4	7.35		7.16	7.36
Specific Conductance	uS/cm	284	312 5	340	465	472.3	514	449		599	653
Temperature	deg c	14	10.9	13.5	16.3	8.8	16	12.8		11	12.1
Turbidity	ntu	4.91	7.77	5.64	0.74	1.99	1.9	4.02		3	1.88

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter

"U" = Indicates the result is not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result was estimated.
"J+" = Indicates the result was estimated and maybe biased high.
"J-" = Indicates the result was estimated and maybe biased low.

Appendix E-3 Analytical Data - Landfill Phases V, VI, and VII
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW26			GAMW26B			GAMW27				
Sample Date		2020-09-16	2021-04-12	2021-09-10	2020-09-16	2021-04-12	2021-09-10	2020-09-17		2021-04-13		2021-09-10
Sample Type		N	N	N	N	N	N	FD	N	FD	N	N
Chemical Name	Unit											
CCR Appendix III												
Boron	mg/L	0.18	0.18	0.22	0 64	0.21	0.21	4	3.9	4.2	4.1	4.1
Calcium	mg/L	86.6	84.7	92.6	158	93.3	103	286	283	276	279	277
Chloride	mg/L	13.8	11 5	4.2	56.3	14.6	23.1	12.3	12 9	20.9	20.4	14.2
Fluoride	mg/L	3.2	2.9	2.8 J-	0.17	0.18	0.11 J-	0 67	0.63	0.66	0.63	0.56 J-
pH	SU	7.23	7.51	7.54	7 62	7.79	7.8		7.33		7.55	7.65
Sulfate	mg/L	53.7	55 2	80.2	803	86.6	189	884	824	693	701	756
Total Dissolved Solids	mg/L	389	350	449	1510	437	624	1370	1340	1250	1270	1400
Field Parameters												
Dissolved Oxygen	mg/L	0.2	1.31	3.45	1.42	1.31	3.45		0.27		0.45	0.21
Oxidation-Reduction Potential	millivolts	-28.4	-0.1	-96.1	-75.4	-0.1	-96.1		-114.7		-118	0.18
pH	SU	7.23	7.79	7.8	7 62	7.79	7.8		7.33		7.55	7.65
Specific Conductance	uS/cm	561	711	737	1516	711	737		1401		1558	170
Temperature	deg c	18	11 53	13.63	12.7	11.53	13.63		16 3		11.5	16.8
Turbidity	ntu	0.49	3.85	2.98	4 65	3.85	2.98		0.53		4.24	1.26

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter

"U" = Indicates the result is not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result was estimated.
"J+" = Indicates the result was estimated and maybe biased high.
"J-" = Indicates the result was estimated and maybe biased low.

Appendix E-3 Analytical Data - Landfill Phases V, VI, and VII
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW27B			GAMW38			GAMW39B			
Sample Date		2020-09-17	2021-04-13	2021-09-13	2020-09-17	2021-04-13	2021-09-11	2020-09-17	2021-04-13	2021-09-11	
Sample Type		N	N	N	N	N	N	N	N	FD	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	12.3	12.1	13.1	0.99	0.87	1	5.8	6.2	6 9	6.9
Calcium	mg/L	356	364	367	79	90.4	77.3	232	249	274	268
Chloride	mg/L	451	408	438	4.9	4.7	4.2	36 5	35.1	37.4	39.9
Fluoride	mg/L	0.05 U	0 05 U	0.05 U	0.19	0.15	0.15	0.055	0.05 U	0 05 U	0.05 U
pH	SU	7.43	7.41	7.36	7.08	7.44	7.03	6.86	7.11		6.68
Sulfate	mg/L	6790	6190	6530	224	211	164	742	687	726	785
Total Dissolved Solids	mg/L	10800	9980	10800	551	522	471	1440	1400	1590	1550
Field Parameters											
Dissolved Oxygen	mg/L	0.6	1 27	1.19	0.17	0.15	0.53	0.12	0.21		0.33
Oxidation-Reduction Potential	millivolts	-110 8	-95.5	-272.6	-104.6	-82.5	-229.7	-95.7	-65.2		-329.8
pH	SU	7.43	7.41	7.36	7.08	7.44	7.03	6.86	7.11		6.68
Specific Conductance	uS/cm	10122	12351	10440	738	816	716	1575	1913		1747
Temperature	deg c	14.1	12.6	14.15	19	9.83	18.94	14 8	11.41		14.37
Turbidity	ntu	0.88	2 35	3.59	1.5	7.49	2.73	4.56	4.62		2.92

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter

"U" = Indicates the result is not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
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Appendix E-3 Analytical Data - Landfill Phases V, VI, and VII
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW39			GAMW39B			GAMW40		
Sample Date		2020-09-17	2021-04-13	2021-09-11	2020-09-17	2021-04-13	2021-09-11	2020-09-17	2021-04-14	2021-09-13
Sample Type		N	N	N	N	N	N	N	N	N
Chemical Name	Unit									
CCR Appendix III										
Boron	mg/L	0.93	1.1	1.4	9.7	10.1	9.8	3.2	2.8	4.1
Calcium	mg/L	229	173	162	386	409	443	280	273	276
Chloride	mg/L	12.2	10.2	9.7	70	61.9	85.7	16.2	12 8	11.8
Fluoride	mg/L	0.12	0.14	0.12	0 05 U	0.05 U	0.5 U	0.18	0.067	0.072
pH	SU	6.51	7.12	6.83	6 67	7.16	6.68	6.52	7.19	6.62
Sulfate	mg/L	430	359	396	1280	1140	1330	438	388	501
Total Dissolved Solids	mg/L	1090	816	865	2400	2230	2690	1450	1360	1550
Field Parameters										
Dissolved Oxygen	mg/L	0.12	0.14	0.43	0.12	0.16	0.48	0.11	0.3	0.46
Oxidation-Reduction Potential	millivolts	-59.6	-42.6	-284	-75.2	-47.6	310.6	-51.1	-39 8	-304
pH	SU	6.51	7.12	6.83	6 67	7.16	6.68	6.52	7.19	6.62
Specific Conductance	uS/cm	1322	1248	1109	2460	2863	2813	1824	1968	1933
Temperature	deg c	18.3	11.05	17.47	15.7	12.32		18.1	10	17.03
Turbidity	ntu	4.29	4 27	1.25	3 64	4.4	2.47	1.02	2.46	0.63

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter

"U" = Indicates the result is not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result was estimated.
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"J-" = Indicates the result was estimated and maybe biased low.

Appendix E-3 Analytical Data - Landfill Phases V, VI, and VII
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW40B			GAMW41			GAMW41B		
Sample Date		2020-09-21	2021-04-14	2021-09-13	2020-09-21	2021-04-14	2021-09-13	2020-09-21	2021-04-13	2021-09-13
Sample Type		N	N	N	N	N	N	N	N	N
Chemical Name	Unit									
CCR Appendix III										
Boron	mg/L	31.3	30	29.9	8 9	10	9.4	28.7	26.2	28.8
Calcium	mg/L	228	225	195	186	123	134	260	223	231
Chloride	mg/L	744	859	700	254	119	44.4	722	571	687
Fluoride	mg/L	0.05 U	0.79	0.05 U	0 21	0.2	0.33	0 05 U	0.79	0 05 U
pH	SU	8.03	8.5	7.87		8.08	7.48		8.05	7 94
Sulfate	mg/L	5640	6420	6580	2450	2220	1750	6750	6320	6250
Total Dissolved Solids	mg/L	11400	9860	11500	4160	3250	2750	11200	10500	10800
Field Parameters										
Dissolved Oxygen	mg/L	0.34	0.23	0.3	0 28	0.14	0.21	0 29	0.42	0.19
Oxidation-Reduction Potential	millivolts	-112 3	-162.9	-288 3	-54.8	-137.2	-247	-134	-187 2	-291.7
pH	SU	8.03	8.5	7.87	7 07	8.08	7.48	8.1	8.05	7 94
Specific Conductance	uS/cm	13584	13406	11500	5522	4602	3312	13465	13006	11430
Temperature	deg c	14.4	11 97	14.28	19.2	10.15	19.2	16.7	13	15.88
Turbidity	ntu	3.7	1.37	1.18	4 21	4.43	1.91	4 28	3.81	1 8

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/L = picocuries per liter

"U" = Indicates the result is not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
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APPENDIX F

2021 Annual Groundwater Monitoring and Corrective Action Reports - January 2022

GOLDER
MEMBER OF WSP

2021 Annual Groundwater Monitoring and Corrective Action Report - Waste Disposal Area

NIPSCO LLC R. M. Schahfer Generating Station

Prepared Pursuant to 40 CFR §257.90(e) and Corresponding Regulations under 329 Indiana Administrative Code 10-9-1

Submitted to:

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

Submitted by:

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January 31, 2022

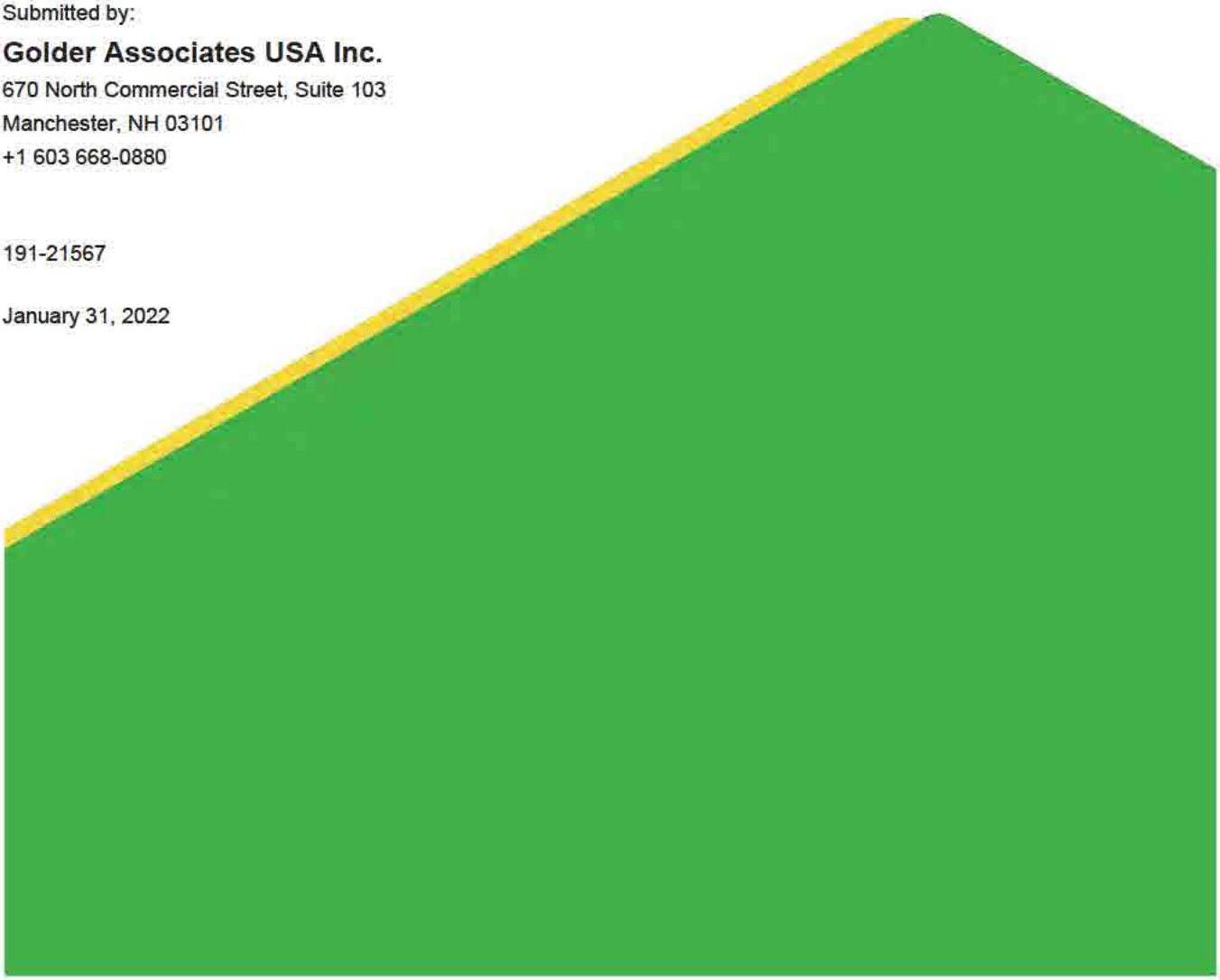


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1.0 INTRODUCTION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates USA Inc., *a member of WSP* (Golder), prepared this 2021 Annual Groundwater Monitoring and Corrective Action Report (2021 Annual Report) for the Rollin M. Schahfer Generating Station (RMSGS, Schahfer) Waste Disposal Area (WDA, the CCR Unit) located at 2723 E 1500 N, Wheatfield, Jasper County, Indiana (Latitude 41° 12' 36" and Longitude 87° 01' 48", see Figure 1). As shown in Figure 2, the WDA is an approximately 80-acre impoundment located in the southwest portion of the RMSGS facility. Golder prepared the 2021 Annual Report in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, “Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule” (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

The CCR Unit is currently in Assessment Monitoring pursuant to 40 CFR §257.95. Routine monitoring activities performed during the reporting period include inspection of wells for integrity and security, measurement of groundwater levels prior to sample collection to assess groundwater flow direction, and collection of groundwater samples for laboratory analysis.

In conformance with the applicable requirements of 40 CFR §257.90(e)(1) through (5) and corresponding State of Indiana requirements, the 2021 Annual Report:

- Documents the status of the groundwater monitoring and corrective action program
- Provides figures showing the CCR Unit and monitoring well locations
- Summarizes key CCR Rule groundwater activities completed during calendar year 2021
- Includes CCR Rule groundwater monitoring data obtained in calendar year 2021
- Describes any problems encountered during the monitoring activities
- Discusses actions taken to resolve the problems, if applicable
- Projects key activities for the upcoming year

2.0 GROUNDWATER MONITORING AND CORRECTIVE ACTION PROGRAM OVERVIEW OF CURRENT STATUS

Starting in 2016 following the installation of a groundwater monitoring system (Table 1) and throughout calendar year 2017, Golder collected background groundwater samples and performed Detection Monitoring at the CCR Unit pursuant to the requirements of 40 CFR §257.94. Due to the identification of significantly statistical increases (SSIs) in January 2018, NIPSCO established an Assessment Monitoring program in April 2018 pursuant to the requirements of 40 CFR §257.95. In 2018, Golder performed the first and second Assessment Monitoring sampling events. Following the first Assessment Monitoring sampling event, including verification sampling, Golder prepared an alternative source demonstration (ASD) indicating that the detections of Appendix IV parameters downgradient of the WDA are not due to a release from the WDA. In 2019, Golder completed the third and fourth Assessment Monitoring sampling events and completed ASDs following each sampling event. In 2020, Golder performed the fifth and sixth Assessment Monitoring sampling events and completed ASDs following each sampling event. In 2021, Golder performed the seventh and eighth Assessment Monitoring sampling events. The WDA began and ended the current annual reporting period in Assessment Monitoring pursuant to 40 CFR §257.95. Appendix IV constituents statistically significant levels (SSLs) identified in 2021 include molybdenum and

lithium in groundwater samples collected from well GAMW-51B and molybdenum in well GAMW-60B. In May 2021, Golder prepared an ASD indicating that the SSLs for molybdenum and lithium were not due to a release from the WDA; therefore, the CCR Unit remained in Assessment Monitoring. Pursuant to 40 CFR §257.94, a qualified Indiana-licensed professional engineer recertified the ASD in November 2021. The sampling dates, number of groundwater samples collected from each background and downgradient well, and the purpose of sampling associated with the seventh and eighth Assessment Monitoring events are provided in Table 2. The 2021 analytical results are presented in Table 3. Based upon groundwater monitoring results collected pursuant to the CCR Rule to date, no corrective action program requirements as outlined in 40 CFR §257.96-98 have either been triggered or implemented at this CCR Unit.

2.1 Key Actions Completed - 2021

NIPSCO completed the following key actions relative to CCR Rule groundwater monitoring at the WDA during calendar year 2021:

- Preparation of the of 2020 Groundwater Monitoring and Corrective Action Annual Report in January 2021 (2020 Annual Report, 40 CFR §257.90(e))
- Evaluation of the results of the sixth Assessment Monitoring event in February 2021 (40 CFR §257.95)
- Notification that constituents in 40 CFR Part 257 Appendix IV exceeded the groundwater protection standard (GWPS) in March 2021 (40 CFR §257.95(g))
- Performance of the seventh Assessment Monitoring event in April 2021 (40 CFR §257.95)
- Recertification of the ASD in May 2021 (40 CFR §257.95(g))
- Evaluation of the results of the seventh Assessment Monitoring event in August 2021 (40 CFR §257.95)
- Notification that constituents in 40 CFR Part 257 Appendix IV exceeded the GWPS in September 2021 (40 CFR §257.95(g))
- Performance of the eighth Assessment Monitoring event in September 2021 (40 CFR §257.95)
- Recertification of the ASD in November 2021 (40 CFR §257.95(g))

2.2 Monitoring System Modifications

The groundwater monitoring system did not require any modifications in 2021 (see Figure 2). Table 1 provides a summary of the well rationale/purpose and date of installation. An overview of the modified groundwater monitoring network is provided in the embedded table below.

Background Monitoring Wells	Downgradient Monitoring Wells	Assessment Monitoring Wells
GAMW03, GAMW-03B, GAMW-68, and GAMW-68B	GAMW-01, GAMW-01B, GAMW-12, GAMW-12B, GAMW-13, GAMW-13B, GAMW-14, and GAMW-14B	GAMW-42, GAMW-42B, GAMW-42C, GAMW-43, GAMW-43B, GAMW-44, GAMW-44B, GAMW-51, GAMW-51B, GAMW-57, GAMW-57B, GAMW-58, GAMW-58B, GAMW-59, GAMW-59B, GAMW-60, and GAMW-60B

2.3 Background Monitoring (2016 to 2017)

Per the requirements of 40 CFR §257.94, Golder collected eight independent background groundwater samples from each background and downgradient well between July 2016 and August 2017. Golder used the results of the background monitoring phase to develop appropriate, statistically valid background values for each constituent/monitoring well. Golder submitted the samples to a contract laboratory, in accordance with chain of custody and quality assurance/quality control procedures, for analysis of 40 CFR Part 257 Appendix III and Appendix IV constituents. In addition, Golder personnel measured field water quality parameters including specific conductance, temperature, dissolved oxygen, turbidity, oxidation-reduction potential, and pH. The background data set was included in the 2017 CCR Annual Groundwater Monitoring and Corrective Action Report, dated January 31, 2018 (2017 Annual Report, Golder 2018).

Golder performed a periodic update of background datasets, which includes incorporation of additional background data, to improve statistical power and accuracy by providing a more conservative estimate of the true background populations. The CCR Rule Groundwater Monitoring Program Implementation Manual (GMPIM, Golder 2017) allows for the statistical limits to be updated after four to eight new measurements are available (i.e., every two to four years of semi-annual monitoring). Golder incorporated the new data into the background dataset, updated the GWPS, in March 2020 (see Table 4).

2.4 Detection Monitoring

Golder performed the first Detection Monitoring event in October 2017, followed by a statistical evaluation and data analysis in January 2018. Golder collected groundwater samples from the CCR Unit background and downgradient monitoring wells for analysis of Appendix III constituents per 40 CFR §257.94 and included the results in the 2017 Annual Report. Following receipt and validation of laboratory results, Golder evaluated the results of the first Detection Monitoring sampling event to compare the concentration of 40 CFR Part 257 Appendix III constituents relative to facility background concentrations. Using Sanitas™ software, Golder pooled the background data to calculate prediction limits and compared the October 2017 results to the calculated prediction limits to identify SSIs. Due to the identification of SSIs, NIPSCO established an Assessment Monitoring program in April 2018.

2.5 Assessment Monitoring

Golder performed the first Assessment Monitoring event (i.e., Assessment and Verification sampling) in March and April 2018, followed by a statistical evaluation and data analysis in August 2018. In March 2018, Golder collected groundwater samples from each background and downgradient monitoring well for analysis of Appendix IV constituents per 40 CFR §257.95. In April 2018, Golder collected groundwater samples from the downgradient monitoring well locations for analysis of Appendix III and detected Appendix IV constituents per 40 CFR §257.95. In August 2018, Golder developed GWPS to compare against the Assessment Monitoring results. Following receipt and validation of laboratory results, Golder evaluated the 40 CFR Part 257 Appendix IV constituent results relative to CCR Unit-specific GWPS (Table 4). At the time of the statistical evaluation, the GWPS was the higher value of either the Maximum Contaminant Level (MCL) or the CCR Unit-specific background concentration for each analyte calculated using a tolerance/prediction limit procedure in accordance with 40 CFR §257.95(h)(2). Golder assessed the groundwater results obtained from the downgradient monitoring wells by comparing the lower confidence limit (LCL) to the CCR Unit-specific GWPS for each Appendix IV analyte at each well. If the LCL exceeds the GWPS, there is statistical evidence of an SSL. Golder determined that SSLs existed for the WDA (molybdenum in GAMW-01, GAMW-13B, and GAMW-14B) but identified an alternative natural source for the

elevated levels of molybdenum detected in downgradient monitoring wells and prepared an ASD. A qualified Indiana-licensed professional engineer certified the ASD in November 2018 (Appendix A of the 2018 CCR Annual Groundwater Monitoring and Corrective Action Report, dated January 31, 2019 (2018 Annual Report, Golder 2019)).

Golder performed the second and third Assessment Monitoring events in October 2018 and April 2019, respectively, by collecting groundwater samples from each background and downgradient monitoring well for analysis of Appendix III and Appendix IV constituents per 40 CFR §257.95. The results from the first and second Assessment Monitoring events are included in the 2018 Annual Report and the results from the third Assessment Monitoring event is included in the 2019 CCR Annual Groundwater Monitoring and Corrective Action Report, dated January 31, 2020 (2019 Annual Report, Golder 2020). Golder performed the statistical evaluation of the analytical results of the second and third Assessment Monitoring sampling events in February 2019 and August 2019, respectively. Golder identified SSLs for arsenic (GAMW-01) and cobalt (GAMW-14). In May 2019, Golder prepared, and a qualified Indiana-licensed professional engineer certified an ASD demonstrating that the arsenic and cobalt concentrations observed in the downgradient monitoring wells were due to natural variation and not to a release from the WDA (Appendix A of the 2019 Annual Report, Golder 2020). A qualified-licensed professional engineer recertified the ASD in November 2019 (Appendix B of the 2019 Annual Report).

Golder collected groundwater samples from the following property boundary Assessment Monitoring wells (see Figure 2):

- GAMW-42/42B, GAMW-43/43B, and GAMW-44/44B in March, April, June, July, August, October, and November 2019
- GAMW-42C, GAMW-57/57B, and GAMW-58/58B installed in June 2019 in July, August, October, and November 2019.

SSLs were not identified in groundwater samples collected from these property boundary wells.

Golder performed the fourth and fifth Assessment Monitoring event in November 2019 and April/May 2020, respectively, by collecting groundwater samples from each background and downgradient monitoring well for analysis of Appendix III and detected Appendix IV constituents per 40 CFR §257.95. The results from the fourth Assessment Monitoring events are included in the 2019 Annual Report. In March 2020, Golder performed the statistical evaluation of the analytical results of the fourth Assessment Monitoring sampling event and identified an SSL for molybdenum in well GAMW-51B. In June 2020, Golder prepared, and a qualified Indiana-licensed professional engineer certified, an ASD demonstrating that the SSL for molybdenum and observed lithium levels above the GWPS in GAMW-51B were not due to a release from the WDA (Appendix A of the 2020 Annual Report, Golder 2021). Golder performed the statistical evaluation of the analytical results of the fifth Assessment Monitoring sampling event in September 2020 and identified SSLs for molybdenum and lithium in well GAMW-51B. As these results were consistent with the previous Assessment Monitoring event, a qualified Indiana-licensed professional engineer recertified the ASD in December 2020 (Appendix B of the 2020 Annual Report, Golder 2021).

Golder performed the sixth Assessment Monitoring event in October 2020 by collecting groundwater samples from each background and downgradient monitoring well for analysis of Appendix III and detected Appendix IV constituents per 40 CFR §257.95. Golder performed the statistical evaluation of the analytical results from the sixth Assessment Monitoring sampling event in February 2021 and identified SSLs for molybdenum and lithium in well GAMW-51B and molybdenum in GAMW-60B. As described in the 2019 Annual Report (Golder 2020), GAMW-60B was installed

downgradient of GAMW-51/51B in 2019 to further assess the nature and extent of groundwater quality further downgradient of the WDA. The October 2020 Assessment Monitoring event was the fourth round of sampling at this location, and therefore, was the first event for which SSLs were calculated. As these results are consistent with the primary lines of evidence presented in the June 2020 ASD, a qualified Indiana-licensed professional engineer recertified the ASD in May 2021 (Appendix A). The results from the fifth and sixth Assessment Monitoring events are included in the 2020 Annual Report (Golder, 2021).

Golder performed the seventh Assessment Monitoring event in April 2021 by collecting groundwater samples from each background and downgradient monitoring well for analysis of Appendix III and Appendix IV constituents per 40 CFR §257.95. Golder performed the statistical evaluation of the analytical results of the seventh Assessment Monitoring sampling event in August 2021 and identified SSLs for molybdenum and lithium in well GAMW-51B and molybdenum in GAMW-60B. As these results were consistent with the previous Assessment Monitoring event, a qualified Indiana-licensed professional engineer recertified the ASD in November 2021 (Appendix B).

Golder performed the eighth Assessment Monitoring event in September 2021 by collecting groundwater samples from each background and downgradient monitoring well for analysis of Appendix III and detected Appendix IV constituents per 40 CFR §257.95. Golder will perform the statistical evaluation of the analytical results from the eighth Assessment Monitoring event in January 2022.

2.6 Statistical Evaluation

After each monitoring event, Golder assessed the analytical data for outliers, anomalies, and trends that might be an indication of a sampling or analytical error. Outliers and anomalies are generally defined as inconsistently large or small values that can occur because of sampling, laboratory, transportation, or transcription errors, or even by chance alone. Significant trends may indicate natural geochemical variability, a source of systematic error, influence of an upgradient/off-site source, or an actual occurrence of CCR Unit influence upon groundwater quality. Appropriate statistical methods are used to remove outliers from the database and manage trends with detrending routines, prior to the calculation of statistical limits. To assess the data for outliers, anomalies, and trends, Golder assessed the data using time vs. concentration graphs, and statistical routines included in the Sanitas™ statistical analysis software package. Golder has not identified any additional outliers since the 2020 Annual Report.

Golder evaluated the background data set for trends using Sanitas™ software. Golder will continue to monitor all trends and apply detrending routines, if applicable, before using these data to calculate GWPS. Golder identified the following 40 CFR Part 257 Appendix IV parameter trends in background monitoring wells:

- Arsenic concentrations detected in groundwater samples collected from GAMW-03B show a deceasing trend and arsenic has never been detected above the MCL in this well. No detrending routines are required.
- Beryllium concentrations detected in groundwater samples collected from GAMW-03 and GAMW-03B show a decreasing trend, beryllium has never been detected above the laboratory reporting limit in these wells, and all background beryllium results are below the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.
- Cadmium concentrations detected in groundwater samples collected from GAMW-03 and GAMW-03B show a decreasing trend, cadmium has never been detected above the laboratory reporting limit in these wells, and all background cadmium results are below the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.

- Chromium concentrations detected in groundwater samples collected from GAMW-03 show a decreasing trend, chromium has never been detected above the laboratory reporting limit in this well, and all background chromium results are below the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.
- Lead concentrations detected in groundwater samples collected from GAMW-03B show a decreasing trend, lead has never been detected above the laboratory reporting limit in this well, and all background lead results are below the health-based standard, therefore the GWPS is equal to the health-based standard. No detrending routines are required.
- Molybdenum concentrations detected in groundwater samples collected from GAMW-03B show an increasing trend, all background results are below the health-based standard, therefore, the GWPS is equal to the health-based standard. No detrending routines are required.
- Thallium concentrations detected in groundwater samples collected from GAMW-03 and GAMW-03B show a decreasing trend, thallium has never been detected above the laboratory reporting limit in these wells, and all background thallium results are below the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.

2.7 Problems Encountered and Follow-Up Corrective Actions

One cooler containing the radium samples collected from GAMW-13/13B and GAMW-14/14B in the seventh Assessment Monitoring event (April 2021), was delayed during shipping (i.e., FedEx issue). The laboratory received the radium samples approximately one month after the sample collection date. Since the radium analyses have no temperature requirements and the laboratory received the samples within the method holding time, the samples were run despite the shipping delay. No follow up corrective action was required.

Golder encountered elevated turbidity levels (i.e., >5 nephelometric turbidity units - NTUs) during the 2021 Assessment Monitoring events including:

- Seventh Assessment Monitoring event (April 2021); Golder collected groundwater samples from monitoring wells GAMW-03 and GAMW-42C at turbidity levels of 5.99 and 7.69 NTUs, respectively.
- Eighth Assessment Monitoring event (September 2021); Golder collected the groundwater sample from monitoring well GAMW-42C at a turbidity level of 5.86 NTUs.

According to the CCR Groundwater Monitoring Program Implementation Manual (Golder 2017), groundwater samples are to be collected once groundwater has achieved a turbidity level below 5 NTUs. Due to time constraints in the field, Golder purged groundwater from the wells for a minimum of two hours and collected groundwater samples when turbidity appeared to stabilize (e.g., no downward or upward trend over three consecutive readings five minutes apart). Evaluation of the analytical results from these wells suggests that the slightly elevated turbidity levels had no significant effect on the representativeness of groundwater quality. During future monitoring events, Golder will purge groundwater for two hours or five well volumes, whichever is shorter and use professional judgement to assess whether the purge water is representative of groundwater for sampling. If an acceptable turbidity level cannot be achieved within a reasonable timeframe (i.e., three hours), Golder will redevelop the affected monitoring wells prior to the next sampling event.

3.0 KEY ACTIVITIES PROJECTED FOR 2022

During calendar year 2022, NIPSCO anticipates conducting the following key CCR Rule groundwater monitoring activities for the WDA:

- Prepare and submit the appropriate notifications according to the CCR Rule;
- Continue semi-annual Assessment Monitoring groundwater sampling per CCR Rule requirements; and,
- Inspect and maintain the monitoring system including wells, pumps, and equipment.

4.0 REFERENCES

Golder Associates, “2017 Annual Groundwater Monitoring and Corrective Action Report - Waste Disposal Area, NIPSCO R. M. Schafer Generating Station”, January 31, 2018.

Golder Associates, “2018 Annual Groundwater Monitoring and Corrective Action Report - Waste Disposal Area, NIPSCO R. M. Schafer Generating Station”, January 31, 2019.

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Tables

Table 1: Monitoring Well Network
CCR Unit Schahfer Waste Disposal Area
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Well Purpose	Monitoring Well ID	Installation Date	Decommission Date (If Applicable)	Basis For Action
Waste Disposal Area	Background Monitoring Well	GAMW-03	6/27/2015	-	Installed for groundwater quality monitoring[1]
		GAMW-03B	5/24/2016	-	
		GAMW-68	8/27/2020	-	
		GAMW-68B	8/27/2020	-	
	Downgradient Monitoring Well	GAMW-01	6/26/2015	-	Installed for groundwater quality monitoring[1]
		GAMW-12	5/23/2016	-	
		GAMW-13	5/24/2016	-	
		GAMW-13B	5/23/2016	-	
		GAMW-14	5/23/2016	-	
		GAMW-14B	5/23/2016	-	
		GAMW-01B	7/31/2018	-	Installed to characterize the nature and extent of a potential release[2]
		GAMW-12B	7/31/2018	-	
		GAMW-51	7/25/2018	-	
		GAMW-51B	7/25/2018	-	
		GAMW-42	7/24/2018	-	Installed to monitor groundwater quality at the property boundary[3]
		GAMW-42B	7/24/2018	-	
		GAMW-42C	6/8/2019	-	
		GAMW-43	5/16/2018	-	
		GAMW-43B	5/16/2018	-	
		GAMW-44	5/16/2018	-	
		GAMW-44B	5/16/2018	-	
		GAMW-57	6/7/2019	-	
		GAMW-57B	6/7/2019	-	
		GAMW-58	6/6/2019	-	
		GAMW-58B	6/6/2019	-	
		GAMW-59	6/8/2019	-	Installed to characterize the nature and extent of a potential release[2]
		GAMW-59B	6/6/2019	-	
		GAMW-60	6/8/2019	-	
		GAMW-60B	6/4/2019	-	

1) Per 40 CFR §257.93, Golder collected eight rounds of background data prior to October 17, 2017, excluding wells GAMW-68 and GAMW-68B.
2) Per 40 CFR §257.95(g)(1)(i) Rule requirements, Golder collected additional data to further characterize the nature and extent of potential groundwater impacts.
3) Per 40 CFR §257.95(g)(1)(iii), Golder collected data to monitor groundwater quality in the direction of flow at the property boundary.

Prepared by: KMC
Checked by: DFSC
Reviewed by: MAH

Table 2: Summary of Sampling Events
CCR Unit Schahfer Waste Disposal Area
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Well Purpose	Monitoring Well ID	Sample Event #16	Sample Event #17	Total Number of Samples
Purpose of Sample		Annual Assessment Monitoring	Semi-Annual Assessment Monitoring	
Sample Parameters		Appendix III and Appendix IV	Appendix III and detected Appendix IV	
Background Monitoring Well	GAMW03	4/14/2021	9/17/2021	2
	GAMW03B	4/15/2021	9/17/2021	2
	GAMW68	4/22/2021	9/17/2021	2
	GAMW68B	4/22/2021	9/17/2021	2
Downgradient Monitoring Well	GAMW01	4/14/2021	9/16/2021	2
	GAMW01B	4/14/2021	9/16/2021	2
	GAMW12	4/15/2021	9/16/2021	2
	GAMW12B	4/15/2021	9/16/2021	2
	GAMW13	4/19/2021	9/17/2021	2
	GAMW13B	4/19/2021	9/17/2021	2
	GAMW14	4/19/2021	9/17/2021	2
	GAMW14B	4/19/2021	9/17/2021	2
	GAMW42	4/23/2021	9/14/2021	2
	GAMW42B	4/23/2021	9/14/2021	2
	GAMW42C	4/23/2021	9/15/2021	2
	GAMW43	4/23/2021	9/14/2021	2
	GAMW43B	4/27/2021	9/14/2021	2
	GAMW44	4/27/2021	9/15/2021	2
	GAMW44B	4/27/2021	9/15/2021	2
	GAMW51	4/21/2021	9/29/2021	2
	GAMW51B	4/21/2021	9/29/2021	2
	GAMW57	4/23/2021	9/15/2021	2
	GAMW57B	4/23/2021	9/15/2021	2
	GAMW58	4/23/2021	9/15/2021	2
	GAMW58B	4/23/2021	9/15/2021	2
	GAMW59	4/21/2021	9/29/2021	2
	GAMW59B	4/22/2021	9/29/2021	2
	GAMW60	4/21/2021	9/24/2021	2
	GAMW60B	4/21/2021	9/24/2021	2
Total Number of Samples		29	29	58

Notes:
Sample counts do not include QC/QA samples.

(1) Sample events #1-15 were completed prior to 2021. The purpose, sample parameters, and sample dates are included in the 2017, 2018, 2019, and 2020 Annual Reports.

(2) Semi-annual assessment monitoring parameters did not include radium.

(3) Sample events #16 and 17 correspond to the seventh and eighth Assessment Monitoring events, respectively.

Prepared by: KMC
Checked by: DFSC
Reviewed by: JSP

Table 3: Analytical Data
CCR Unit R. M. Schahfer Waste Disposal Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW01		GAMW01B		GAMW03		GAMW03B		GAMW12		GAMW12B			GAMW13		GAMW13B	
Sample Date		2021-04-14	2021-09-16	2021-04-14	2021-09-16	2021-04-14	2021-09-17	2021-04-15	2021-09-17	2021-04-15	2021-09-16	2021-04-15		2021-09-16	2021-04-19	2021-09-17	2021-04-19	2021-09-17
Sample Type		N	N	N	N	N	N	N	N	N	N	FD	N	N	N	N	N	N
Chemical Name	Unit																	
CCR Appendix III																		
Boron	mg/L	0.78	0.26	0.35	0.29	0.22	0.13	0.25	0.27	0.1 U	0.1 U	0.29	0.31	0.32	0.16	0.19	0.71	0.8
Calcium	mg/L	86.2	78.7	103	112	90.3	70.2	96.4	102	87	80.7	103	104	107	95.6	71.2	92.7	77.8
Chloride	mg/L	10.1	5.9	20.6	16.6	4.3	4.2	20.1	23.1	2.3	3.2	20.5	20.6	20.6	4.3	10.5	28.3	26
Fluoride	mg/L	0.29	0.36 J-	0.078	0.094 J-	0.13	0.2	0.2	0.23	0.16	0.19 J-	0.079	0.082	0.079 J-	0.27	0.31	0.31	0.25
pH	SU	7.11	6.61	6.96	6.5	6.77	6.9	7.03	6.97	7.31	6.49		7.55	6.99	6.95	6.67	7.73	7.32
Sulfate	mg/L	157	42.3	85.2	80.3	97.5	40.2	58	78.6	9.2	24.2	63.5	66.5	57.5	48.6	49.3	146	137
Total Dissolved Solids	mg/L	574	294	450	443	390	258	400	430	336	325	435	433	451	356	317	376	395
CCR Appendix IV																		
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.012	0.02	0.001 U	0.001 U	0.0064	0.019	0.001 U	0.001 U	0.012	0.043	0.001 U	0.001 U	0.001 U	0.027	0.0076	0.0012	0.001
Barium	mg/L	0.051	0.049	0.17	0.17	0.074	0.08	0.11	0.12	0.095	0.094	0.13	0.13	0.14	0.11	0.08	0.081	0.077
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 J	0.002 U	0.002 U
Cobalt	mg/L	0.0019	0.001	0.001	0.001 U	0.0055	0.001 U	0.001 U	0.001 J	0.0025	0.0028	0.001 J	0.001 U	0.001 U	0.0012	0.001 J	0.001 U	0.001 U
Fluoride	mg/L	0.29	0.36 J-	0.078	0.094 J-	0.13	0.2	0.2	0.23	0.16	0.19 J-	0.079	0.082	0.079 J-	0.27	0.31	0.31	0.25
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 J	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 J	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.011	0.0076	0.001 U	0.001 U	0.011	0.0084	0.0051	0.0066	0.0025	0.0041	0.0012	0.0012	0.0013	0.0096	0.004	0.016	0.016
Radium, Total	pCi/l	0.842 U		2.02		0.152 U		1.58 J		1.1 U		1.85	2.22		1.08 U		0.82 U	
Selenium	mg/l	0.01 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U
Thallium	mg/l	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U
Field Parameters																		
Dissolved Oxygen	mg/L	0.6	0.49	0.51	0.5	1.47	0.27	0.95	0.28	0.2	0.28		0.13	0.46	0.46	0.29	0.23	0.32
Oxidation-Reduction Potential	millivolts	-37.2	-240.2	-88	-217.5	-33.4	-225.9	-81.5	-255.4	-90.7	-191.9		-107.1	-265.3	-16.8	-155.2	-120.6	-259.6
pH	SU	7.11	6.61	6.96	6.5	6.77	6.9	7.03	6.97	7.31	6.49		7.55	6.99	6.95	6.67	7.73	7.32
Specific Conductance	uS/cm	721	524	752	705	605	479	695	634	583	625		709	704	461	560	527	568
Temperature	deg c	9.7	13.22	12.1	14.36	9.5	16.05	11.6	13.22	9.04	18.11		11.67	14.01	9.5	10.94	11.97	14.13
Turbidity	ntu	4.06	0.51	3.19	2.19	5.99	2.0	4.06	3.19	4.70	4.53		3.56	3.64	0.79	2.17	3.92	0.5

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/l = picocuries per liter

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+"= Indicates the result is estimated and may be biased high.

"UJ"= Indicates the result was not detected above MDL for the sample and the RL is estimated. The estimated RL is provided.

Table 3: Analytical Data
CCR Unit R. M. Schahfer Waste Disposal Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

	Location	GAMW14		GAMW14B			GAMW42		GAMW42B		GAMW42C		GAMW43		GAMW43B			GAMW44	
	Sample Date	2021-04-19	2021-09-17	2021-04-19		2021-09-17	2021-04-23	2021-09-14	2021-04-23	2021-09-14	2021-04-23	2021-09-15	2021-04-23	2021-09-14	2021-04-27		2021-09-14	2021-04-27	2021-09-15
	Sample Type	N	N	FD	N	N	N	N	N	N	N	N	N	N	FD	N	N	N	N
Chemical Name	Unit																		
CCR Appendix III																			
Boron	mg/L	0.28	0.2	2.8	2.8	2.7	0.1 U	0.1 U	0.1 U	0.1 U	0.89	0.82	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Calcium	mg/L	67.7	82.6	146	143	112	47.1	59.9	57.9	62.6	48.6	53.9	28	32.6	41.2	40.4	38.2	21.6	20.2
Chloride	mg/L	11.5	10.6	112	108	85.2	4.2	11.4	8.6	10.3	8.3	8.3	0.53	0.63	1.7	1.7	1.8	2.3	1.7
Fluoride	mg/L	0.26	0.26	0.29	0.29	0.28	0.17 J-	0.19	0.15 J-	0.12	0.2 J-	0.22	0.13 J-	0.11	0.19	0.19	0.15	0.19	0.13
pH	SU	7.03	6.61		7.71	7.39	7.62	7	7.72	6	7.59	7.36	7.22	7.22		8.04	7.64	6.21	6.21
Sulfate	mg/L	40.6	31.8	1330	1350	841	29.9	66.5	37.7	31.8	4.4	4.3	30	28.4	28.9 J+	27.9 J+	22.3	63.0 J+	44.9
Total Dissolved Solids	mg/L	270	330	1730	1740	1660	148	253	193	241	203	254	86	137	145	151	137	165	136
CCR Appendix IV																			
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.018	0.036	0.001 U	0.001 U	0.001 U	0.0012	0.0011	0.001 U	0.001 U	0.001 U	0.001 U	0.0016	0.0028	0.001 U	0.001 U	0.001 U	0.086	0.052
Barium	mg/L	0.051	0.081	0.08	0.08	0.059	0.018	0.023	0.016	0.021	0.0092	0.0089	0.019	0.026	0.012	0.011	0.01	0.018	0.02
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.0034	0.002 U
Cobalt	mg/L	0.017	0.024	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0024	0.0022	0.001 U	0.001 U	0.001 U	0.0026	0.0029
Fluoride	mg/L	0.26	0.26	0.29	0.29	0.28	0.17 J-	0.19	0.15 J-	0.12	0.2 J-	0.22	0.13 J-	0.11	0.19	0.19	0.15	0.19	0.13
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.032	0.024	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0073	0.0077	0.028	0.028	0.01	0.0022	0.0033	0.0029	0.0027	0.0026	0.0021	0.0015	0.002	0.0023	0.0021	0.0021	0.0044	0.004
Radium, Total	pCi/l	0.883 U		1.92	1.85		0 U		0.852 U		0.902 U		0.568 U		0.985 U	0.731 U		0.385 U	
Selenium	mg/l	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/l	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																			
Dissolved Oxygen	mg/L	0.2	0.29		0.29	0.42	0.59	0.17	0.49	0.15	0.43	0.12	0.7	0.54		0.51	0.27	1.97	0.83
Oxidation-Reduction Potential	millivolts	-31.7	-234.5		-103.5	-193.7	-80.8	-191	-125.5	-251	-123.3	-231	35.1	-329		-108.7	-323.9	-8.1	-294.6
pH	SU	7.03	6.61		7.71	7.39	7.62	7	7.72	6	7.59	7.36	7.22	7.22		8.04	7.64	6.21	6.21
Specific Conductance	uS/cm	577	566		2126	2053	326.1	413	407	414	455.1	475	209	226		282	191	257.8	192
Temperature	deg c	10.2	16.03		12.37	13.96	9.9	14.9	11.0	13.1	11.0	12.7	9.7	17.91		11.4	12.86	11.2	16.11
Turbidity	ntu	4.15	0.05		1.66	1.1	2.56	1.76	4.07	3.98	7.39	5.36	4.3	2.99		2.36	1.37	4.66	2.04

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/l = picocuries per liter

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+"= Indicates the result is estimated and may be biased high.

"UJ"= Indicates the result was not detected above MDL for the sample and the RL is estimated. The estimated RL is provided.

Table 3: Analytical Data
CCR Unit R. M. Schahfer Waste Disposal Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW44B		GAMW51			GAMW51B		GAMW57		GAMW57B		GAMW58		GAMW58B			GAMW59	
Sample Date		2021-04-27	2021-09-15	2021-04-21	2021-09-29		2021-04-21	2021-09-29	2021-04-29	2021-09-15	2021-04-29	2021-09-15	2021-04-23	2021-09-15	2021-04-23	2021-09-15		2021-04-21	2021-09-29
Sample Type		N	N	N	FD	N	N	N	N	N	N	N	N	N	N	FD	N	N	N
Chemical Name	Unit																		
CCR Appendix III																			
Boron	mg/L	0.1 U	0.1 U	0.43	0.51	0.5	7.2	7	0.1 U	0.1 U	0.1 U	0.13	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.89	1
Calcium	mg/L	31.2	31.7	144	148	147	281	282	3.9	21.8	43.1	47.5	7.3	10.9	37.8	29.2	36.6	209	217
Chloride	mg/L	1.6	1.5	1.5	2.3	2.3	54.8	53.2	1.6	1	11.2	12.4	0.85	1.1	3.6	2.1	4	11.3	21.1
Fluoride	mg/L	0.14	0.10	0.26	0.34	0.34	0.45	0.62	0.05 UJ	0.073	0.13 J-	0.17	0.22 J-	0.35	0.15 J-	0.12	0.18	0.42	0.7
pH	SU	6.22	7.01	7.19		7.04	6.11	7.63	6.22	8.03	7.95	7.33	4.4	5.07	7.92		7.32	7.53	7.28
Sulfate	mg/L	12.3 J+	7.5	156	161	153	1460	1480	38	25.8	10.1	24.4	45	38.0	24.9	32.1	23.6	473	434
Total Dissolved Solids	mg/L	85	113	604	597	600	2180 J	2270	58	101	160	205	44 J	82	124	135	161	756	866
CCR Appendix IV																			
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U	0.001 J
Arsenic	mg/L	0.001 U	0.001 U	0.0016	0.0016	0.0016	0.004	0.0044	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.0012	0.002
Barium	mg/L	0.0084	0.0082	0.1	0.1	0.11	0.072	0.077	0.014	0.0025	0.02	0.022	0.059	0.041	0.015	0.0044	0.015	0.048	0.056
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 J	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002	0.00075	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 J	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.00025	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 J	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.0033	0.0031	0.0031	0.001 U	0.001 U	0.0014	0.001 U	0.001 U	0.001 U	0.01	0.0093	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.14	0.10	0.26	0.34	0.34	0.45	0.62	0.05 UJ	0.073	0.13 J-	0.17	0.22 J-	0.35	0.15 J-	0.12	0.18	0.42	0.7
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.012	0.012	0.071	0.078	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 J	0.008 U	0.012	0.018
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 J	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0022	0.002	0.011	0.0092	0.0098	0.16	0.15	0.0011	0.003	0.0028	0.0067	0.001 U	0.001 U	0.0037	0.001 J	0.0041	0.03	0.015
Radium, Total	pCi/l	1.03 U		1.23 U			3.57		0.194 U		0.368 U		1.95		0.705 U			1.17 U	
Selenium	mg/l	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0025	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U
Thallium	mg/l	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U	0.001 J
Field Parameters																			
Dissolved Oxygen	mg/L	0.5	0.36	0.48		0.27	0.55	0.29	4.93	6.33	0.22	0.37	4.1	0.98	0.3		0.73	0.21	0.25
Oxidation-Reduction Potential	millivolts	-125.6	-318	-100.6		0.197	-108.7	0.246	111.6	-237.7	-132.7	-316.7	291	-314	-140.4		-298.9	-105.5	0.232
pH	SU	6.22	7.81	7.19		7.04	6.11	7.63	6.22	8.03	7.95	7.33	4.4	5.87	7.92		7.32	7.53	7.28
Specific Conductance	uS/cm	210.9	156	873		937	3094	303.9	124	136	291	264	110	102	252		213	1035	125.5
Temperature	deg c	11.5	12.16	11.1		13.9	12.4	14.2	10.25	12.45	11.2	11.54	9.27	13.67	10.04		11.37	11.28	22.2
Turbidity	ntu	2.15	1.19	4.2		4.12	1.02	1.43	2.7	2.83	3.04	1.85	0.04	1.27	2.96		2.66	4.0	4.52

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/l = picocuries per liter

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+"= Indicates the result is estimated and may be biased high.

"UJ"= Indicates the result was not detected above MDL for the sample and the RL is estimated. The estimated RL is provided.

Table 3: Analytical Data
CCR Unit R. M. Schahfer Waste Disposal Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

	Location	GAMW59B		GAMW60		GAMW60B		GAMW63		GAMW63B	
	Sample Date	2021-04-22	2021-09-29	2021-04-21	2021-09-24	2021-04-21	2021-09-24	2021-04-22	2021-09-17	2021-04-22	2021-09-17
	Sample Type	N	N	N	N	N	N	N	N	N	N
Chemical Name	Unit										
CCR Appendix III											
Boron	mg/L	5.4	6.3	1	0.97	6.5	7.3	0.1 U	0.1 U	0.1 U	0.1 U
Calcium	mg/L	292	253	343	379	351	309	60.7	66.4	43.5	44.7
Chloride	mg/L	52	51.3	17.2	16.5	14.3	69.8	22.6	20.4	19.3	18.4
Fluoride	mg/L	0.45	0.53	0.3	0.51	0.34	1.1	0.16	0.26	0.1	0.2
pH	SU	7.6	7.57	7.05	7.01	7.74	7.76	7.52	7.75	8.35	7.99
Sulfate	mg/L	1180	1180	748	1050	1140	443	68.6	81.3	62.5	63.6
Total Dissolved Solids	mg/L	1960	1960	1300	1540	2710	1440	320	316	2040	242
CCR Appendix IV											
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Barium	mg/L	0.037	0.04	0.027	0.031	0.077	0.063	0.065	0.1	0.11	0.1
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.0013	0.002	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.45	0.53	0.3	0.51	0.34	1.1	0.16	0.26	0.1	0.2
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.017	0.016	0.012	0.015	0.034	0.045	0.006 U	0.0061	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.041	0.05	0.013	0.015	0.35	0.37	0.0035	0.0045	0.0022	0.0027
Radium, Total	pCi/l	1.76		1.29 U		3.02		0.285 U		1.35 U	
Selenium	mg/l	0.001 U	0.001 U	0.0017	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/l	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters											
Dissolved Oxygen	mg/L	0.49	0.29	1.34	0.29	0.56	0.25	0.51	0.28	0.5	0.21
Oxidation-Reduction Potential	millivolts	-119.4	0.231	64.3	0.56	-121.3	0.238	-39.2	0.187	-154.3	0.216
pH	SU	7.6	7.57	7.05	7.01	7.74	7.76	7.52	7.75	8.35	7.99
Specific Conductance	uS/cm	2650	264.7	1747	167.2	2181	209.6	490	515	4[illegible]1	413
Temperature	deg c	10.1	17.4	11.5	20.7	12.2	14.9	9.7	18	11.8	13.5
Turbidity	ntu	1.46	1.50	0.9	1.56	1.04	2.05	2.02	0.99	3.57	3.56

Note:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
pCi/l = picocuries per liter

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J+" = Indicates the result is estimated and may be biased low.
"J-" = Indicates the result is estimated and may be biased high.

"UJ"= Indicates the result was not detected above MDL for the sample and the RL is estimated. The estimated RL is provided.

Prepared by: SLG
Checked by: DPSC
Reviewed by: JSD

Table 4: Groundwater Protection Standards
CCR Unit Schahfer Waste Disposal Area
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

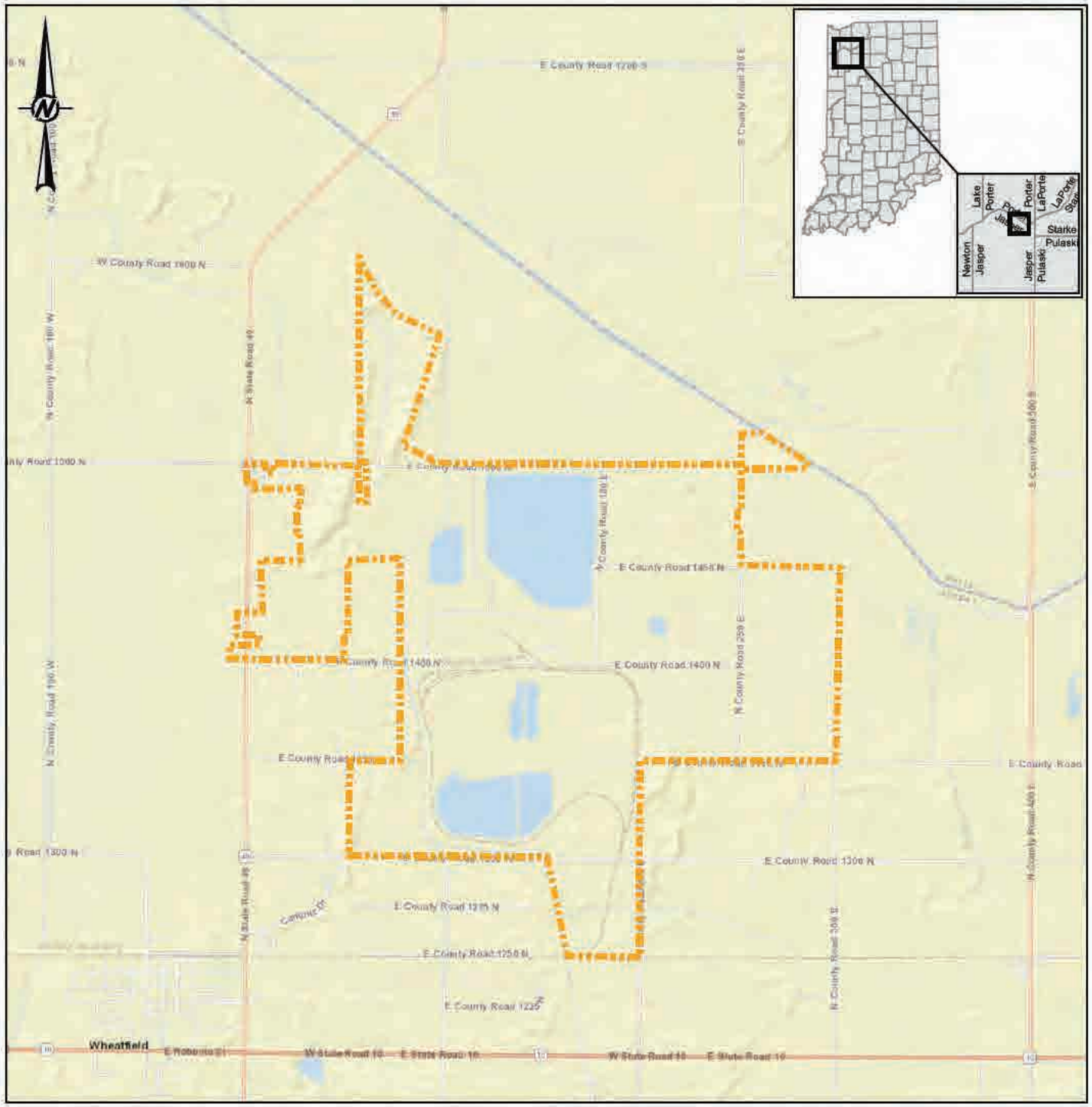
Analyte	MCL (mg/L)	GWPS (mg/L)[2]	GWPS (mg/L)[3]
Antimony	0.006	0.006	0.006
Arsenic	0.01	0.015	0.018
Barium	2	2	2
Beryllium	0.004	0.004	0.004
Cadmium	0.005	0.005	0.005
Chromium	0.1	0.1	0.1
Cobalt[1]	0.006	0.015	0.015
Fluoride	4	4	4
Lead[1]	0.015	0.015	0.015
Lithium[1]	0.04	0.04	0.04
Mercury	0.002	0.002	0.002
Molybdenum[1]	0.1	0.1	0.1
Radium 226+228	5	5	5
Selenium	0.05	0.05	0.05
Thallium	0.002	0.002	0.002

Notes:
MCL= Environmental Protection Agency Maximum Contaminant Level
GWPS= Groundwater Protection Standard
mg/L= milligrams per liter

1) As of August 29, 2018, these four constituents have health-based standards that can be used when calculating the GWPS, these health-based standards are not MCLs but are provided in the MCL column.
2) GWPS calculated in August 2018.
3) GWPS calculated in March 2020.

Prepared by: KMC
Checked by: DFSC
Reviewed by: JSP

Figures



LEGEND

Approximate Property Line

0 0.75 1.5

1 " = 0.75 miles Miles

REFERENCE(S)

SERVICE LAYER CREDITS: SOURCES: ESRI, HERE, GARMIN, USGS, NTERMAP, INCREMENT P, NRCAN, ESRI JAPAN, METI, ESRI CH NA (HONG KONG), ESRI KOREA, ESRI (THAILAND), NGCC, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

SITE LOCATION MAP

CONSULTANT

GOLDER
MEMBER OF WSP

YYYY-MM-DD	1/4/2021
DESIGNED	DFS
PREPARED	SHL
REVIEWED	JSP
APPROVED	MAH

PROJECT NO.	CONTROL	REV.	FIGURE
19121567	A	0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI A



LEGEND

- Assessment Monitoring Well
- Background Monitoring Well
- Downgradient Monitoring Well
- Generalized Groundwater Flow Direction
- Approximate Property Line
- CCR Unit

0 400 800

1" = 400 feet

NOTE(S)

1. SERVICE LAYER CREDITS: SOURCE: ESRI, MAXAR, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRID, IGN, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

WELL LOCATION MAP
WASTE DISPOSAL AREA

CONSULTANT

GOLDER

DESIGNED	DFS
PREPARED	TEH
REVIEWED	BKH
APPROVED	MHH

PROJECT NO. 19121567 | CONTROL A | REV. 0 | FIGURE 2

APPENDIX A

Waste Disposal Area Alternative Source Demonstration May 2021

Northern Indiana Public Service Company LLC (NIPSCO LLC)

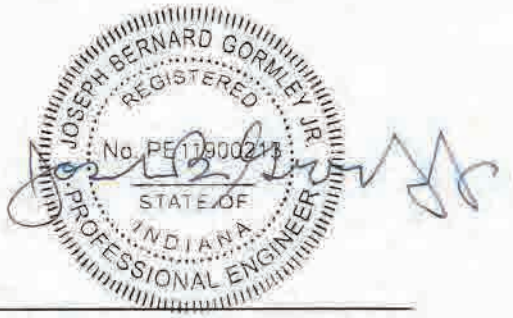
R. M. Schahfer Generating Station – Waste Disposal Area

Wheatfield, Indiana

Recertification of Alternative Source Demonstration

40 CFR §257.95

I have personally reviewed this recertification of the alternative source demonstration (ASD), the subject of which is the Waste Disposal Area (WDA) at the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder Associates Inc. and dated May 2021. Based on an inquiry of those individuals immediately responsible and on supporting data that I understand to be true, accurate, and complete, I verify the information in this recertification of the ASD is accurate and meets the applicable requirements of the CCR Final Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as the WDA meets the applicable requirements of 40 CFR §257.95.



Joseph Bernard Gormley, Jr.
Indiana Professional Engineer
License #: PE11900213

5/18/2021
Date

TECHNICAL MEMORANDUM

DATE May 18, 2021 **Project No.** 19121567

TO Jeff Loewe, Dan Sullivan, NIPSCO LLC

CC Maggie Rice, Maureen Turman, Joe Kutch, Mark Haney, Jim Peace, Joe Gormley

FROM Danielle Sylvia Cofelice **EMAIL dsylvia@golder.com**

RE: RECERTIFICATION OF R.M. SCHAHFER WASTE DISPOSAL AREA ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO LLC), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the sixth (October 2020) groundwater Assessment Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Waste Disposal Area (WDA, CCR Unit). This evaluation was conducted in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule" (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

The statistical evaluation of analytical data from the sixth Assessment Monitoring event was completed on February 17, 2021. The results of the statistical evaluation indicated the lower confidence level (LCL) exceeded the background concentrations for lithium and molybdenum in assessment monitoring well GAMW51B and the background concentration for molybdenum in assessment monitoring well GAMW60B, which are interpreted as apparent evidence of a statistically-significant levels (SSLs). Although determination of an SSL generally indicates that the groundwater monitoring program should transition from Assessment Monitoring to Assessment of Corrective Measures, 40 CFR §257.95(g)(3) allows the owner or operator (i.e., NIPSCO LLC) to demonstrate that a source other than the CCR Unit or another condition caused the apparent SSL.

Golder identified similar concentrations of lithium and molybdenum in groundwater samples collected from GAMW51B after the fourth (October 2019) Assessment Monitoring event at the WDA and submitted an Alternative Source Demonstration (ASD) on June 9, 2020 (Golder 2020). As described in the ASD, the source material characteristics and site hydrogeology indicated that the source of the lithium and molybdenum SSLs observed in GAMW51B was not due to a release from the WDA. Golder recertified this ASD after the fifth Assessment Monitoring event (April 2020), which confirmed the molybdenum and lithium results observed in GAMW-51B.

1.0 SUMMARY OF OCTOBER 2020 RESULTS

The lithium and molybdenum concentrations in samples collected from GAMW51B in October 2020 were 0.063 milligrams per liter (mg/L) and 0.17 mg/L, respectively. These results are less than two times the Groundwater Protection Standards (GWPS) of 0.04 mg/L and 0.1 mg/L for lithium and molybdenum, respectively, which are equal to the risk-based levels included in the CCR Rule, Part 1 Phase 1 Addendum. The molybdenum concentrations in the samples collected to date from GAMW60B range from 0.38 mg/L to 0.49 mg/L (approximately four times the GWPS of 0.1 mg/L). The October 2020 Assessment Monitoring event was the fourth

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round of sampling at this location. The most recent molybdenum and lithium results collected at both locations are within the range of the previous data. Overall, the data are consistent with the previous Assessment Monitoring event.

2.0 ALTERNATIVE SOURCE DEMONSTRATION

As described in the June 2020 ASD, Assessment Monitoring well GAMW60B was installed downgradient of GAMW51/51B in 2019 to further assess the nature and extent and overall groundwater quality farther downgradient of the WDA. Monitoring wells GAMW14, GAMW14B, GAMW51, and GAMW51B are all located between the WDA and Assessment Monitoring well GAMW60B (see Figure 1). The WDA has generally received and managed the same waste streams and been operated in a consistent manner since its opening more than 35 years ago. Given the lengthy time horizon of operations and geochemical fingerprints of the source materials within the CCR Unit, if the WDA was the source of molybdenum in groundwater at GAMW60B, it would be expected that upgradient wells would have similar or higher concentrations of molybdenum, which they do not.

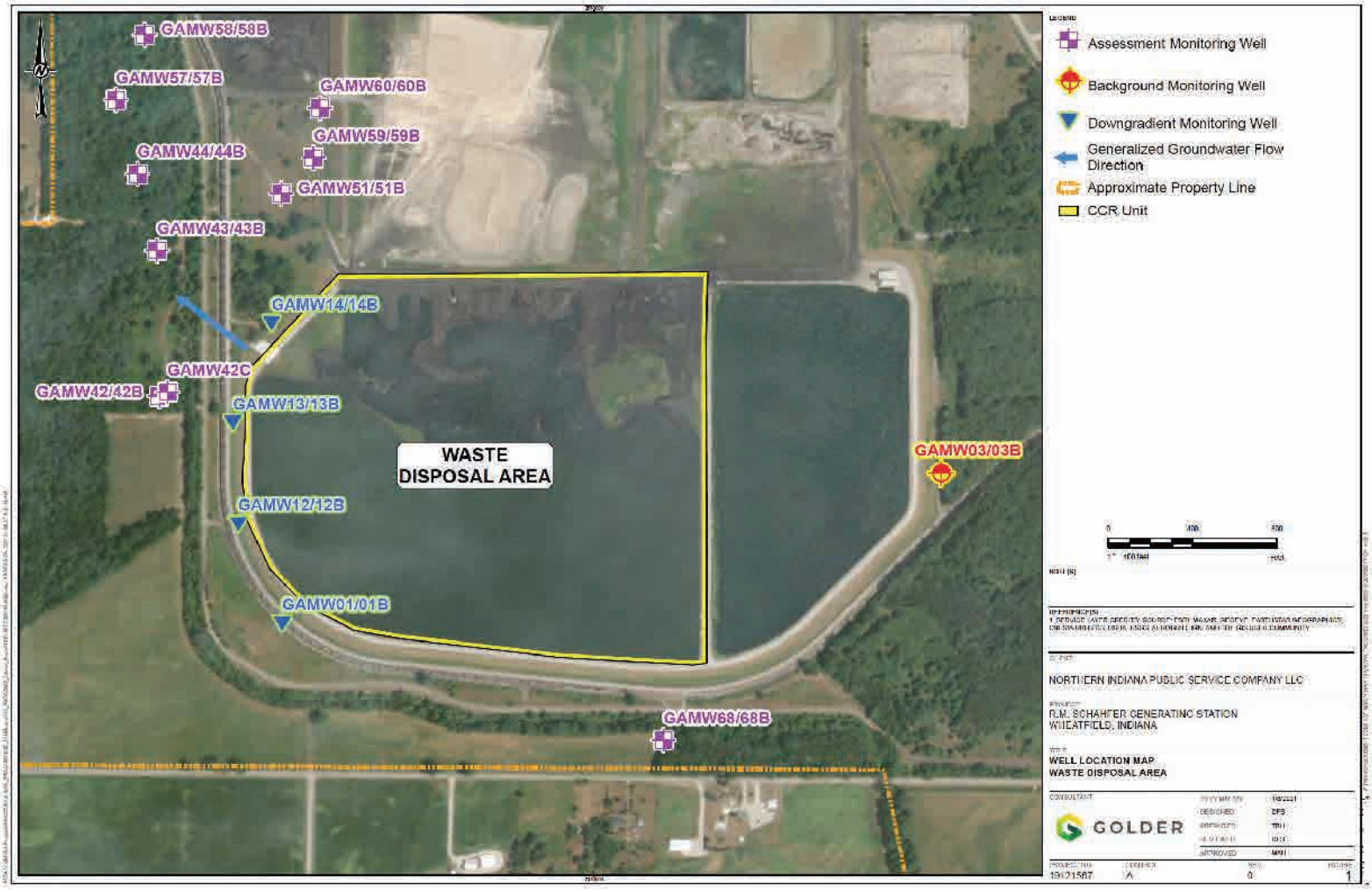
The 2020 WDA ASD discusses three primary lines of evidence: 1) the low concentrations of molybdenum in the WDA source materials and porewater, 2) the relative major ion abundance in groundwater that demonstrates a distinct difference between WDA porewater and downgradient groundwater samples, with no indications of mixing, and 3) the waste management boundary monitoring wells GAMW14 and GAMW14B, which are located upgradient of monitoring wells GAMW51B and GAMW60B, do not indicate molybdenum above the GWPS, . Considered individually and together, these lines of evidence indicate the CCR Unit is not the source of the molybdenum in the groundwater monitored by GAMW51B and GAMW60B.

The information presented above confirms the results of the sixth Assessment Monitoring event are consistent with the previous Assessment Monitoring event, and the rationale presented in the June 9, 2020 ASD is still applicable. Golder prepared the current ASD in accordance with 40 CFR 257.95(g)(3) and it supports the finding that the SSLs determined in the February 17, 2021 statistical evaluation are not due to release from the CCR Unit. As described above and in the June 9, 2020 ASD, the source material characteristics and site hydrogeology indicate that the source of the lithium and molybdenum SSLs observed in GAMW51B and the molybdenum SSL in GAMW60B are due to a different condition and not due to a release from the WDA. Therefore, no further action (i.e., Assessment of Corrective Measures) is warranted, and the WDA will remain in Assessment Monitoring.

3.0 REFERENCES

Golder 2020. Alternative Source Demonstration - Waste Disposal Area, Golder Associates Inc., June 9, 2020.

https://golderassociates.sharepoint com/sites/nipscoccrgwmonitoring/shared documents/rmsgs/reports/wda asd spring 2021/wda recertification 2021-05 docx


GAMW58/58B
GAMW57/57B
GAMW60/60B
GAMW59/59B
GAMW44/44B
GAMW51/51B
GAMW43/43B
GAMW14/14B
GAMW42C
GAMW42/42B
GAMW13/13B
WASTE DISPOSAL AREA
GAMW03/03B
GAMW12/12B
GAMW01/01B
GAMW68/68B
Assessment Monitoring Well
Background Monitoring Well
Downgradient Monitoring Well
Generalized Groundwater Flow Direction
Approximate Property Line
CCR Unit
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA
WELL LOCATION MAP
WASTE DISPOSAL AREA
GOLDER
DESIGNED
DPS
APPROVED
MW
19121587
A
0
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APPENDIX B

Waste Disposal Area Alternative Source Demonstration November 2021

Northern Indiana Public Service Company LLC (NIPSCO LLC)

R. M. Schahfer Generating Station – Waste Disposal Area

Wheatfield, Indiana

Recertification of Alternative Source Demonstration

40 CFR §257.95

I have personally reviewed this recertification of the alternative source demonstration (ASD), the subject of which is the Waste Disposal Area (WDA) at the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder Associates Inc. and dated November 2021. Based on an inquiry of those individuals immediately responsible and on supporting data that I understand to be true, accurate, and complete, I verify the information in this recertification of the ASD is accurate and meets the applicable requirements of the CCR Final Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as the WDA meets the applicable requirements of 40 CFR §257.95.



Joseph Bernard Gormley, Jr.
Indiana Professional Engineer
License #: PE11900213

11/12/2021
Date

GOLDER

TECHNICAL MEMORANDUM

DATE November12, 2021 **Project No.** 19121567

TO Jeff Loewe, Dan Sullivan, NIPSCO LLC

CC Maggie Rice, Maureen Turman, Joe Kutch, Mark Haney, Jim Peace, Joe Gormley

FROM Danielle Sylvia Cofelice **EMAIL dsylvia@golder.com**

RE: RECERTIFICATION OF R.M. SCHAHFER WASTE DISPOSAL AREA ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the seventh (April 2021) groundwater Assessment Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Waste Disposal Area (WDA, CCR Unit). This evaluation was conducted in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule" (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

The statistical evaluation of analytical data from the seventh Assessment Monitoring event was completed on August 19, 2021. The results of the statistical evaluation indicated the lower confidence level (LCL) concentrations for lithium and molybdenum in assessment monitoring well GAMW51B and molybdenum in assessment monitoring well GAMW60B exceeded background concentrations, which are interpreted as apparent evidence of statistically-significant levels (SSLs) in those wells. Although determination of apparent SSLs generally indicates that the groundwater monitoring program should transition from Assessment Monitoring to Assessment of Corrective Measures, 40 CFR §257.95(g)(3) allows the owner or operator (e.g., NIPSCO) to demonstrate that a source other than the CCR Unit or another condition caused the apparent SSLs.

Golder identified similar concentrations of lithium and molybdenum in GAMW51B after the fourth (October 2019) Assessment Monitoring event at the WDA and submitted an Alternative Source Demonstration (ASD) on June 9, 2020 (Golder 2020). As described in the ASD, the source material characteristics and site hydrogeology indicated that the apparent lithium and molybdenum SSLs observed in GAMW51B were not due to a release from the WDA. Golder recertified this ASD after the fifth Assessment Monitoring event (April 2020) and sixth Assessment Monitoring event (October 2020), which confirmed the molybdenum and lithium results observed previously in GAMW51B.

1.0 SUMMARY OF APRIL 2021 RESULTS

The lithium and molybdenum concentrations in samples collected from GAMW51B in April 2021 were 0.071 milligrams per liter (mg/L) and 0.16 mg/L, respectively. These results are less than two times the Groundwater Protection Standards (GWPS) of 0.04 mg/L and 0.1 mg/L for lithium and molybdenum, respectively, which are equal to the risk-based levels included in the CCR Rule, Part 1 Phase 1 Addendum. The molybdenum concentrations in the samples collected to date from GAMW60B range from 0.35 mg/L to 0.49 mg/L (approximately four times the GWPS of 0.1 mg/L). The most recent molybdenum and lithium results collected at

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both locations are within the range of the previous concentrations and are consistent with the previous Assessment Monitoring event.

2.0 ALTERNATIVE SOURCE DEMONSTRATION

As described in the June 2020 ASD, Assessment Monitoring well GAMW60B was installed downgradient of wells GAMW51 and GAMW51B in 2019 to further assess the nature and extent and overall groundwater quality farther downgradient of the WDA. Monitoring wells GAMW14, GAMW14B, GAMW51, and GAMW51B are all located between the WDA and Assessment Monitoring well GAMW60B (see Figure 1). The WDA has generally received and managed the same waste streams and been operated in a consistent manner since its opening more than 35 years ago. Given the lengthy time horizon of operations and geochemical fingerprints of the source materials within the CCR Unit, if the WDA was the source of molybdenum in groundwater at GAMW60B, it would be expected that wells upgradient of GAMW60B would have similar or higher concentrations of molybdenum, which they do not.

The June 2020 WDA ASD discusses three primary lines of evidence: 1) the low concentrations of molybdenum in the WDA source materials and porewater, 2) the relative major ion abundance in groundwater that demonstrates a distinct difference between WDA porewater and downgradient groundwater samples, with no indications of mixing, and 3) the waste management boundary monitoring wells GAMW14 and GAMW14B, which are located upgradient of monitoring wells GAMW51B and GAMW60B, do not indicate molybdenum above the GWPS. Considered individually and together, these lines of evidence indicate the CCR Unit is not the source of the molybdenum in the groundwater monitored by GAMW51B and GAMW60B.

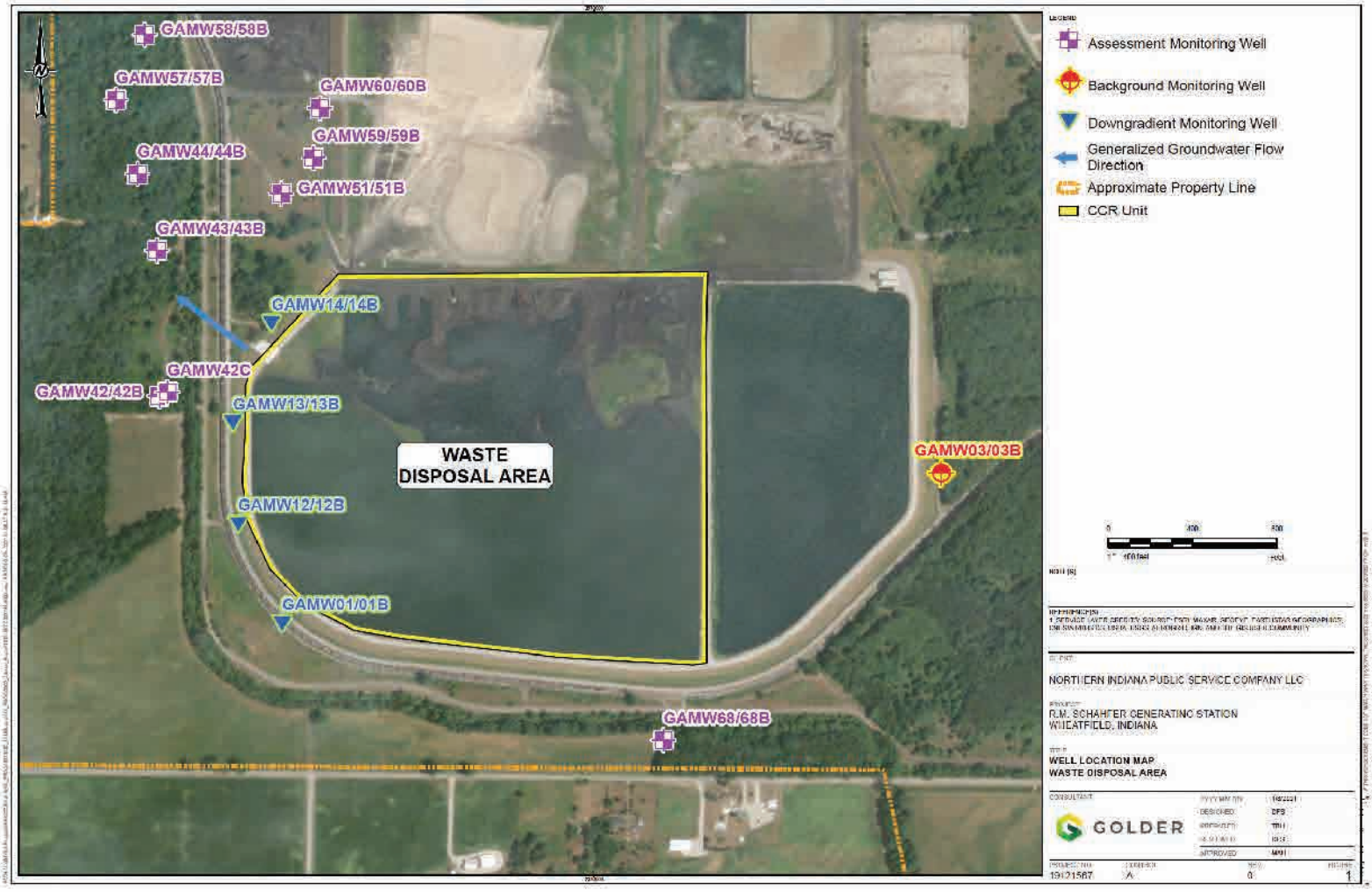
The information presented above confirms the results of the seventh Assessment Monitoring event are consistent with the previous Assessment Monitoring event, and the rationale presented in the June 9, 2020 ASD is still applicable. Golder prepared the current ASD in accordance with 40 CFR 257.95(g)(3) and it supports the finding that the SSLs determined in the August 19, 2021 statistical evaluation are not due to release from the CCR Unit. As described above and in the June 9, 2020 ASD, the source material characteristics and site hydrogeology indicate that the source of the apparent lithium and molybdenum SSLs observed in GAMW51B and the apparent molybdenum SSL in GAMW60B are due to a different condition and not due to a release from the WDA. Therefore, no further action (i.e., Assessment of Corrective Measures) is warranted, and the WDA will remain in Assessment Monitoring.

3.0 REFERENCES

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GAMW58/58B
GAMW57/57B
GAMW60/60B
GAMW59/59B
GAMW44/44B
GAMW51/51B
GAMW43/43B
GAMW14/14B
GAMW42C
GAMW42/42B
GAMW13/13B
WASTE DISPOSAL AREA
GAMW03/03B
GAMW12/12B
GAMW01/01B
GAMW68/68B
Assessment Monitoring Well
Background Monitoring Well
Downgradient Monitoring Well
Generalized Groundwater Flow Direction
Approximate Property Line
CCR Unit
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA
WELL LOCATION MAP
WASTE DISPOSAL AREA
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2021 Annual Groundwater Monitoring and Corrective Action Report - Material Storage Runoff Basin, Metal Cleaning Waste Basin, and Drying Area

NIPSCO LLC R. M. Schahfer Generating Station

Prepared Pursuant to 40 CFR §257.90(e) and Corresponding Regulations under 329 Indiana Administrative Code 10-9-1

Submitted to:

Northern Indiana Public Service Company LLC
R.M. Schahfer Generating Station
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January 31, 2022

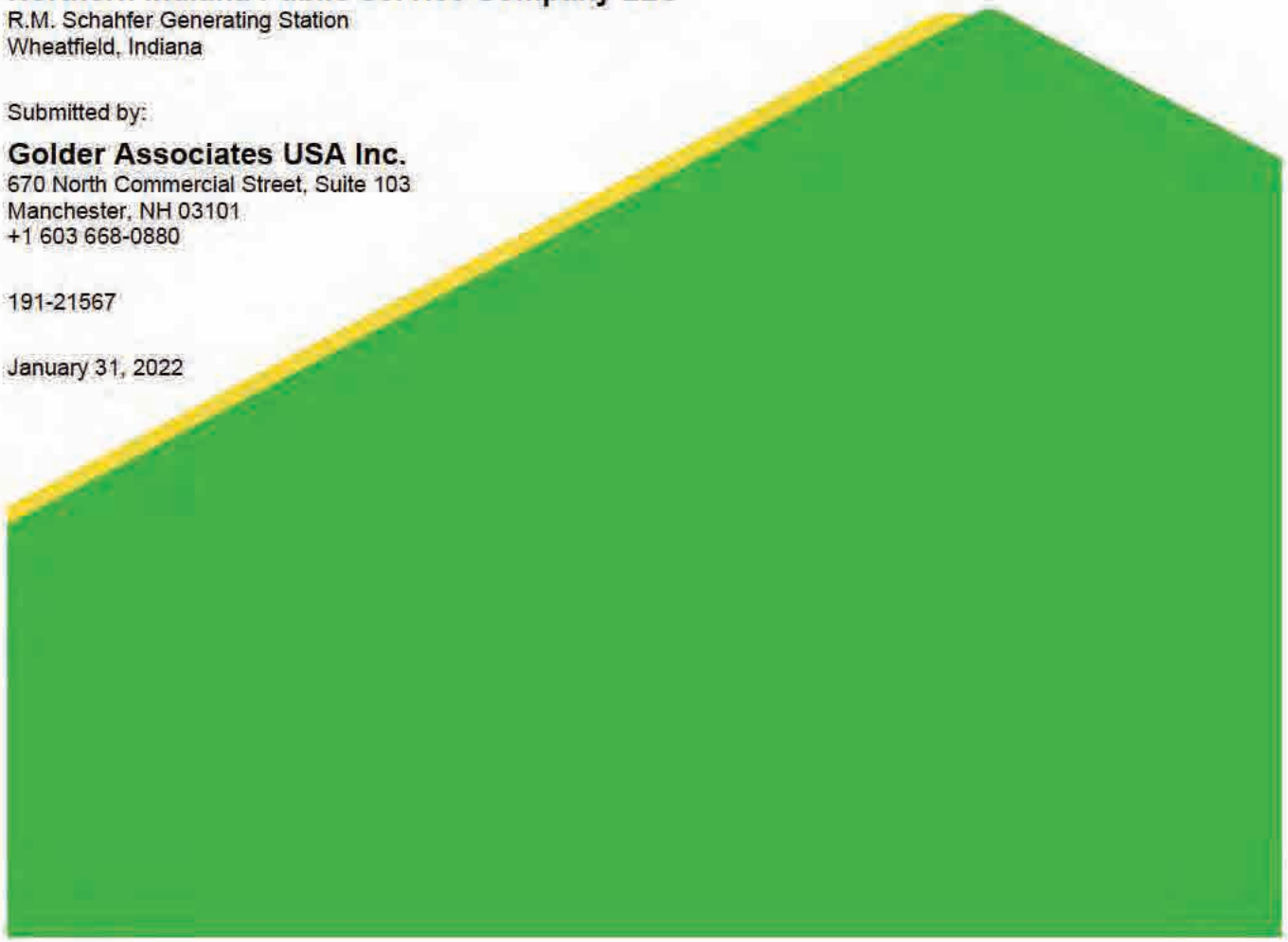


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1.0 INTRODUCTION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates USA Inc., *a member of WSP* (Golder), prepared this 2021 Annual Groundwater Monitoring and Corrective Action Report (2021 Annual Report) for the Rollin M. Schahfer Generating Station (RMSGS, Schahfer) Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and the Drying Area (together, the CCR Unit) located at 2723 E 1500 N, Wheatfield, Jasper County, Indiana (Latitude 41° 12' 36" and Longitude 87° 01' 48", see Figure 1). As shown in Figure 2, the Drying Area is an approximately 5.5-acre impoundment that has been filled with CCR. The MSRB and MCWB consist of two rectangular, approximately 15-acre impoundments, separated by a narrow berm, located adjacent to one another. Golder prepared the 2021 Annual Report in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, “Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule” (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

To comply with the CCR Rule, NIPSCO and Golder decided to monitor the MSRB, MCWB, and Drying Area as one CCR Unit due to the proximity of the MSRB, MCWB, and the Drying Area to one another, and because there are no practical means of monitoring groundwater between the impoundments. The CCR Unit is currently in Assessment Monitoring pursuant to 40 CFR §257.95. Routine monitoring activities performed during the reporting period include inspection of wells for integrity and security, measurement of groundwater levels prior to sample collection to assess groundwater flow direction, and collection of groundwater samples for laboratory analysis.

In conformance with the applicable requirements of 40 CFR §257.90(e)(1) through (5) and corresponding State of Indiana requirements, the 2021 Annual Report:

- Documents the status of the groundwater monitoring and corrective action program
- Provides figures showing the CCR Unit and monitoring well locations
- Summarizes key CCR Rule groundwater activities completed during calendar year 2021
- Includes CCR Rule groundwater monitoring data obtained in calendar year 2021
- Describes any problems encountered during the monitoring activities
- Discusses actions taken to resolve the problems, if applicable
- Projects key activities for the upcoming year

2.0 GROUNDWATER MONITORING AND CORRECTIVE ACTION PROGRAM OVERVIEW OF CURRENT STATUS

Starting in 2016 following the installation of a groundwater monitoring system (Table 1) and throughout calendar year 2017, Golder collected background groundwater samples and performed Detection Monitoring at the CCR Unit pursuant to the requirements of 40 CFR §257.94. Due to the identification of significantly statistical increases (SSIs) in January 2018, NIPSCO established an Assessment Monitoring program in April 2018 pursuant to the requirements of 40 CFR §257.95. In 2018, Golder performed the first and second Assessment Monitoring sampling events. Following the first Assessment Monitoring sampling event, including verification sampling, NIPSCO posted a notification to the publicly-accessible website that there were detections of 40 CFR Part 257 Appendix IV parameters downgradient of the MSRB, MCWB, and Drying Area above applicable groundwater

protection standards (GWPS). Consequently, NIPSCO initiated the assessment of corrective measures (ACM). process in November 2018. Golder performed subsequent monitoring events including:

- Third and fourth Assessment Monitoring events in 2019
- Fifth and sixth Assessment Monitoring events in 2020
- Seventh and Eighth Assessment Monitoring events in 2021

The sampling dates, number of groundwater samples collected from each background and downgradient well, and the purpose of sampling associated with the seventh and eighth Assessment Monitoring events are provided in Table 2. The 2021 analytical results are presented in Table 3. The CCR Unit began and ended the current annual reporting period in Assessment Monitoring pursuant to §257.95. Golder identified cobalt as an Appendix IV statistically significant level (SSL) in a groundwater sample collected from monitoring well GAMW-08 in 2021.

NIPSCO completed the assessment of corrective measures for groundwater impacts and prepared the ACM Report in April 2019. NIPSCO prepared Addendum #1 to the ACM Report in November 2020 and Addendum #2 to the ACM Report in July 2021. NIPSCO is continuing to evaluate the feasibility and design of potential groundwater remedial alternatives in accordance with the provisions of 40 CFR §259.97(a). NIPSCO has not selected a groundwater remedy nor completed the pond closure activities; therefore, no remediation activities were performed in 2021. NIPSCO will schedule a public meeting to present the proposed remedial approach for public comment at least 30 days prior to the selection of remedy.

2.1 Key Actions Completed - 2021

NIPSCO completed the following key actions relative to CCR Rule groundwater monitoring at the MSRB, MCWB, and Drying Area during calendar year 2021:

- Preparation of the 2020 Groundwater Monitoring and Corrective Action Annual Report in January 2021 (2020 Annual Report, 40 CFR §257.90(e))
- Evaluation of the results of the sixth Assessment Monitoring event in February 2021 (40 CFR §257.95)
- Notification that constituents in 40 CFR Part 257 Appendix IV exceeded the GWPS in March 2021 (40 CFR §257.95(g))
- Performance of the seventh Assessment Monitoring event in April 2021 (40 CFR §257.95)
- Preparation of the fourth semi-annual Selection of Remedy Progress Report in April 2021 (40 CFR §257.97)
- Preparation of Addendum #2 to the Assessment of Corrective Measures Report in July 2021 (40 CFR §257.96)
- Evaluation of the results of the seventh Assessment Monitoring event in August 2021 (40 CFR §257.95)
- Notification that constituents in 40 CFR Part 257 Appendix IV exceeded the GWPS in September 2021 (40 CFR §257.95(g))
- Performance of the eighth Assessment Monitoring event in September/October 2021 (40 CFR §257.95)
- Preparation of the fifth semi-annual Selection of Remedy Progress Report in October 2021 (40 CFR §257.97)

2.2 Monitoring System Modifications

The groundwater monitoring system did not require any modifications in 2021 (see Figure 2). Attached Table 1 provides a summary of the well rationale/purpose and date of installation. An overview of the modified groundwater monitoring network is provided in the embedded table below.

Background Monitoring Wells	Downgradient Monitoring Wells	Assessment Monitoring Wells
GAMW-04, GAMW-07, GAMW-07B, GAMW-15 and GAMW-15B	GAMW-08, GAMW-08B, GAMW-09, GAMW-09B, GAMW-16R, GAMW-16BR, GAMW-17, GAMW-17B, GAMW-18 and GAMW-18B	GAMW-46, GAMW-46B, GAMW-52, GAMW-52B, GAMW-53, GAMW-53B, GAMW-54, GAMW-54B, GAMW-55R, GAMW-55B, GAMW-56, and GAMW-56B

2.3 Background Monitoring (2016 to 2017)

Per the requirements of 40 CFR §257.94, Golder collected eight independent background groundwater samples from each background and downgradient well between July 2016 and August 2017. Golder used the results of the background monitoring phase to develop appropriate, statistically valid background values for each constituent/monitoring well. Golder submitted the samples to a contract laboratory, in accordance with chain of custody and quality assurance/quality control procedures, for analysis of 40 CFR Part 257 Appendix III and Appendix IV constituents. In addition, Golder personnel measured field water quality parameters including specific conductance, temperature, dissolved oxygen, turbidity, oxidation-reduction potential, and pH. The background data set is included in the 2017 CCR Annual Groundwater Monitoring and Corrective Action Report, dated January 31, 2018 (2017 Annual Report, Golder 2018).

Golder performed a periodic update of background datasets, which includes incorporation of additional background data, to improve statistical power and accuracy by providing a more conservative estimate of the true background populations. The CCR Rule Groundwater Monitoring Program Implementation Manual (GMPIM, Golder 2017) allows for the statistical limits to be updated after four to eight new measurements are available (i.e., every two to four years of semi-annual monitoring). Golder incorporated the new data into the background dataset, updated the GWPS, in March 2020.

2.4 Detection Monitoring

Golder performed the first Detection Monitoring event in October 2017, followed by a statistical evaluation and data analysis in January 2018. Golder collected groundwater samples from the CCR Unit background and downgradient monitoring wells for analysis of Appendix III constituents per 40 CFR §257.94 and included the results in the 2017 Annual Report. Following receipt and validation of laboratory results, Golder evaluated the results of the first Detection Monitoring sampling event to compare the concentration of 40 CFR Part 257 Appendix III constituents relative to facility background concentrations. Using Sanitas™ software, Golder pooled the background data to calculate prediction limits and compared the October 2017 results to the calculated prediction limits to identify SSIs. Due to the identification of SSIs, NIPSCO established an Assessment Monitoring program in April 2018.

2.5 Assessment Monitoring

Golder performed the first Assessment Monitoring event (i.e., Assessment and Verification sampling) in March and April 2018, followed by a statistical evaluation and data analysis in August 2018. In March 2018, Golder collected groundwater samples from each background and downgradient monitoring well for analysis of Appendix IV constituents per 40 CFR §257.95. In April 2018, groundwater samples were collected at the downgradient monitoring well locations and analyzed for Appendix III and detected Appendix IV constituents per 40 CFR §257.95. In August 2018, Golder developed GWPS to compare with the Assessment Monitoring results. Following receipt and validation of laboratory results, Golder evaluated the 40 CFR Part 257 Appendix IV constituent results relative to CCR Unit-specific GWPS (see Table 4). At the time of the statistical evaluation the GWPS was the higher value of either the Maximum Contaminant Level (MCL) or the CCR Unit-specific background concentration for each analyte calculated using a tolerance/prediction limit procedure in accordance with 40 CFR §257.95(h)(2). Results from the downgradient monitoring wells were evaluated by comparing the lower confidence limit (LCL) to the CCR Unit-specific GWPS for each 40 CFR Part 257 Appendix IV analyte at each well. If the LCL exceeds the GWPS, there is statistical evidence of a statistically significant level (SSL). Golder determined that SSLs existed for the MSRB, MCWB, and Drying Area in August 2018 and initiated the assessment of corrective measures in November 2018.

Golder performed additional Assessment Monitoring events by collecting groundwater samples from each background and downgradient monitoring well per 40 CFR §257.95 including:

- Second Assessment Monitoring Event – October 2018: Golder performed the second Assessment Monitoring event by collecting groundwater samples for analysis of Appendix III and detected Appendix IV constituents. Golder performed the statistical evaluation of the analytical results of the second Assessment Monitoring sampling event in February 2019. The results identified an SSL for cobalt at GAMW-08. The results from the first and second Assessment Monitoring events are included in the 2018 Annual Groundwater Monitoring and Corrective Action Report, dated January 31, 2019 (2018 Annual Report, Golder 2019).
- Third Assessment Monitoring Event – April 2019: Golder performed the third Assessment Monitoring event by collecting groundwater samples for analysis of Appendix III and Appendix IV constituents. Golder performed the statistical evaluation of the analytical results of the third Assessment Monitoring sampling event in August 2019. The results confirmed the SSLs cobalt at GAMW-08.
- Fourth Assessment Monitoring Event – November 2019: Golder performed the fourth Assessment Monitoring event by collecting groundwater samples for analysis of Appendix III and detected Appendix IV constituents. Golder performed the statistical evaluation of the analytical results of the second Assessment Monitoring sampling event in March 2020. The groundwater results confirmed the SSL for cobalt at well GAMW-08. The results from the third Assessment Monitoring event are included in the 2019 Annual Groundwater Monitoring and Corrective Action Report, dated January 31, 2020 (2019 Annual Report, Golder 2020).
- Boundary Well Sampling – 2019: Golder collected groundwater samples from property boundary Assessment Monitoring wells GAMW-46/46B (see Figure 2) in March, April, June, July, August, October, and November 2019. SSLs were not identified in these groundwater samples. These results are included in the 2019 Annual Report (Golder, 2020).

- Fifth Assessment Monitoring Event – April/May 2020: Golder performed the fifth Assessment Monitoring event by collecting groundwater samples for analysis of Appendix III and Appendix IV constituents. Golder performed the statistical evaluation of the analytical results of the third Assessment Monitoring sampling event in September 2020. The results confirmed the SSLs cobalt at GAMW-08.
- Sixth Assessment Monitoring Event – October 2020: Golder performed the sixth Assessment Monitoring event by collecting groundwater samples for analysis of Appendix III and detected Appendix IV constituents. Golder performed the statistical evaluation of the analytical results of the second Assessment Monitoring sampling event in February 2021. The groundwater results confirmed the SSL for cobalt at well GAMW-08. The results from the fifth and sixth Assessment Monitoring events are included in the 2020 Annual Report (Golder 2021).
- Seventh Assessment Monitoring Event – April 2021: Golder performed the seventh Assessment Monitoring event by collecting groundwater samples for analysis of Appendix III and Appendix IV constituents. Golder performed the statistical evaluation of the analytical results of the third Assessment Monitoring sampling event in August 2021. The results confirmed the SSLs cobalt at GAMW-08.
- Eighth Assessment Monitoring Event – September/October 2021: Golder performed the eighth Assessment Monitoring event by collecting groundwater samples for analysis of Appendix III and detected Appendix IV constituents. Golder will perform the statistical evaluation of the analytical results of the eighth Assessment Monitoring sampling event in January 2022.

2.6 Corrective Action

NIPSCO is evaluating the feasibility and design of the potential groundwater remedial alternatives presented in the Assessment of Corrective Measures (ACM) report (Golder, 2019). As discussed in the ACM, NIPSCO plans to close this CCR Unit by removal in accordance with 40 CFR §257.102(c). NIPSCO submitted a Closure Application to the Indiana Department of Environmental Management (IDEM) in April 2019. In November 2020, Golder submitted Addendum #1 to the Assessment of Corrective Measures Report that provided further details of Golder's evaluation of the potential corrective measures. Golder performed the following remedy selection-related activities in 2021:

- NIPSCO continued to refine the Closure Application/Design of the MCU in response to IDEM comments and submitted the final Closure Application on May 13, 2021.
- Following submittal of the final Closure Application and confirmation that IDEM was in general agreement with the modified cap design, Golder prepared the MCU Assessment of Corrective Measures - Addendum #2 to reevaluate the list of potential corrective measures identified in the ACM based on their compatibility with the modified cap design. ACM Addendum #2 revised and updated information provided in the predecessor documents and incorporated the low permeability cap design in all corrective measure alternatives identified in the ACM and in Addendum #1, effectively eliminating four of the ACM alternatives from further consideration.
- Golder performed additional engineering evaluations of the four remaining alternatives accounting for the low permeability cap design and its impact on the selection of remedy for groundwater Corrective Measures.

In 2022, Golder will continue to prepare a detailed evaluation/comparison of the groundwater corrective measure alternatives, including conceptual designs and engineering cost estimates, that will provide NIPSCO with sufficient

information to select a remedy that effectively meets the requirements of 40 CFR §257.97 including protection of public health and the environment. This detailed evaluation/comparison of corrective measures will be documented in a future Selection of Remedy Report for the CCR Unit.

2.7 Statistical Evaluation

After each monitoring event, Golder assessed the analytical data for outliers, anomalies, and trends that might be an indication of a sampling or analytical error. Outliers and anomalies are generally defined as inconsistently large or small values that can occur because of sampling, laboratory, transportation, or transcription errors, or even by chance alone. Significant trends may indicate natural geochemical variability, a source of systematic error, influence of an upgradient/off-site source, or an actual occurrence of CCR Unit influence upon groundwater quality. Appropriate statistical methods are used to remove outliers from the database and manage trends with detrending routines, prior to the calculation of statistical limits. To assess the data for outliers, anomalies, and trends, Golder assessed the data using time vs. concentration graphs, and statistical routines included in the Sanitas™ statistical analysis software package.

In addition to the outliers identified in the 2018 Annual Report and 2020 Annual Report, Golder identified the following outliers in 2021 (no outliers were identified in the 2019 Annual Report).

Golder identified all groundwater data obtained from GAMW-15, GAMW-15B, GAMW-16R, and GAMW-16BR in October 2020 and April 2021 as outliers and removed these data from the data set for the following reasons:

- Statistical testing, including the Dixon outlier test, identified several of the results from each event as outliers; and
- In Summer 2020, NIPSCO performed planned dewatering activities in near these wells during construction activities to divert discharges to the MCU. Trend charts indicate that the dewatering activities drastically affected the October 2020 data. The April 2021 data indicate that the results are trending toward preconstruction concentrations.

Golder identified the April 2021 pH results from GAMW-09, GAMW-09B, and GAMW-18 as outliers and removed these data from the data set for the following reasons:

- Statistical testing, including the Dixon outlier test, identified these results as outliers;
- Trend charts indicated that these results were inconsistent with other concentrations detected in these wells; and
- The pH field calibration check associated with these samples failed.

Golder evaluated the background data set for trends using Sanitas™ software. Golder will continue to monitor trends and apply detrending routines, if applicable, before using these data to calculate GWPS. Golder identified the following 40 CFR Part 257 Appendix IV parameter trends in background monitoring wells:

- Antimony concentrations detected in groundwater samples collected from GAMW-07 show a decreasing trend. Antimony has never been detected at concentrations above the laboratory reporting limit in groundwater samples collected from this well and all background results are below the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.

- Arsenic concentrations detected in groundwater samples collected from wells GAMW-07 and GAMW-15B show a decreasing trend, arsenic has never been detected at concentrations above the above the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.
- Barium concentrations detected in groundwater samples collected from well GAMW-15B show an increasing trend. All barium background results are below the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.
- Beryllium concentrations detected in groundwater samples collected from wells GAMW-07, GAMW-15, and GAMW-15B show a decreasing trend. Beryllium has never been detected at concentrations above the laboratory reporting limit in these wells and all background results are below the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.
- Cadmium concentrations detected in groundwater samples collected from wells GAMW-04, GAMW-15, and GAMW-15B show a decreasing trend. All background results are below the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.
- Lead concentrations detected in groundwater samples collected from well GAMW-15B show a decreasing trend. Lead has never been detected at concentrations above the laboratory reporting limit in this well and all background results are below the health-based standard, therefore, the GWPS is equal to the health-based standard. No detrending routines are required.
- Lithium concentrations detected in groundwater samples collected from well GAMW-15B show an increasing trend. All results are below the health-based standard, therefore, the GWPS is equal to the health-based standard. No detrending routines are required.
- Thallium concentrations detected in groundwater samples collected from wells GAMW-04, GAMW-07, and GAMW-15 show a decreasing trend. All results are below the laboratory reporting limit and the MCL, therefore, the GWPS is equal to the MCL. No detrending routines are required.

2.8 Problems Encountered and Follow-Up Corrective Actions

One cooler containing the radium samples collected from GAMW-54 and GAMW-54B in the seventh Assessment Monitoring event (April 2021), was delayed during shipping. The samples were received approximately one month after collection. Since the radium analyses have no temperature requirements and the samples were received within the method holding time, the samples were analyzed despite the shipping delay. No follow-up corrective action was required.

During the seventh Assessment Monitoring event (April 2021), the pH calibration check failed on April 20, 2021. Samples were collected from wells GAMW-09, GAMW-09B, and GAMW-18 on this date. The pH values for these samples were 1 to 3 standard pH units higher than all previous events and were removed from the dataset as outliers. Golder performed maintenance on the groundwater quality meter used for sampling on April 20, 2021 and subsequent calibration checks passed.

During the seventh Assessment Monitoring event (April 2021), Golder collected groundwater from monitoring wells GAMW-15, GAMW-16BR, GAMW-54, GAMW-54B, and GAMW-56B at turbidity levels of approximately 9.82, 7.82, 6.79, 6.74, and 6.72 nephelometric turbidity units (NTUs), respectively. During the eighth Assessment Monitoring event (September/October 2021), groundwater was sampled from monitoring wells GAMW-04, GAMW-15, GAMW-16BR at turbidity levels of approximately 7.06, 6.36, and 20.19NTUs, respectively. According

to the CCR Groundwater Monitoring Program Implementation Manual (Golder 2017), groundwater samples will be collected once groundwater has achieved a turbidity level below 5 NTUs. Due to time constraints in the field, Golder purged groundwater from the wells for a minimum of two hours and sampled when turbidity appeared to stabilize (e.g., no downward or upward trend over three consecutive readings five minutes apart). Evaluation of the analytical results from these wells suggests that the slightly elevated turbidity levels had no significant effect on the representativeness of the samples of groundwater quality. During future monitoring events, Golder will purge groundwater for two hours or five well volumes, whichever is shorter. Golder will use professional judgement to assess whether purge water is representative of groundwater for sampling. If an acceptable turbidity level cannot be achieved within a reasonable timeframe (e.g., three hours), Golder will redevelop the affected monitoring wells prior to the next sampling event.

3.0 KEY ACTIVITIES PROJECTED FOR 2022

During calendar year 2022, NIPSCO anticipates conducting the following key CCR Rule groundwater monitoring activities for the MSRB, MCWB, and Drying Area:

- Prepare and submit the appropriate notifications according to the CCR Rule;
- Continue semi-annual Assessment Monitoring groundwater sampling per CCR Rule requirements;
- Continue to evaluate potential remedial alternatives and prepare semi-annual reports describing the progress in selecting and designing the remedy; and
- Inspect and maintain the monitoring system including wells, pumps, and equipment.

4.0 REFERENCES

Golder Associates, “2017 Annual Groundwater Monitoring and Corrective Action Report- Material Storage Runoff Basin, Metal Cleaning Waste Basin, and Drying Area NIPSCO R. M. Schahfer Generating Station”, January 31, 2018.

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Golder Associates, “NIPSCO R.M. Schahfer Generating Station, CCR Unit Consisting of MSRB, MCWB, and DA Corrective Measures Selection of Remedy, Semi-Annual Progress Report #20-02” October 9, 2020.

Golder Associates, “CCR Assessment of Corrective Measures Report – Addendum” November 30, 2020.

Golder Associates, “NIPSCO R.M. Schahfer Generating Station, CCR Unit Consisting of MSRB, MCWB, and DA Corrective Measures Selection of Remedy, Semi-Annual Progress Report #21-01” April 9, 2021.

Golder Associates, “CCR Assessment of Corrective Measures Report- Addendum #2” July 29, 2021.

Golder Associates, “NIPSCO R.M. Schahfer Generating Station, CCR Unit Consisting of MSRB, MCWB, and DA Corrective Measures Selection of Remedy, Semi-Annual Progress Report #21-02” October 11, 2021.

TABLES

Table 1 Monitoring Well Network
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Well Purpose	Monitoring Well ID	Installation Date	Decommission Date (If Applicable)	Basis For Action
Material Storage Runoff Basin, Metal Cleaning Waste Basin, and Drying Area	Background Monitoring Well	GAMW-04	6/27/2015	-	Installed for groundwater quality monitoring[1]
		GAMW-07	6/29/2015	-	
		GAMW-15	5/25/2016	-	
		GAMW-15B	5/24/2016	-	
		GAMW-07B	7/25/2018	-	Installed to provide additional groundwater quality data
	Downgradient Monitoring Well	GAMW-08	6/28/2015	-	Installed for groundwater quality monitoring[1]
		GAMW-09	6/28/2015	-	
		GAMW-09B	5/24/2016	-	
		GAMW-16	5/26/2016	NA	Removed during construction activities[5]
		GAMW-16R	9/23/2020	-	Installed to replace GAMW-16[5]
		GAMW-16B	5/25/2016	9/22/2020	Decommissioned due to construction activities[6]
		GAMW-16BR	9/22/2020	-	Installed to replace GAMW-16B[6]
		GAMW-17	5/25/2016	-	Installed for groundwater quality monitoring[1]
		GAMW-17B	5/25/2016	-	
		GAMW-18	5/24/2016	-	
		GAMW-08B	7/25/2018	-	Installed to characterize the nature and extent of a potential release[2]
		GAMW-18B	7/26/2018	-	
		GAMW-52	7/30/2018	-	
		GAMW-52B	7/30/2018	-	
		GAMW-53	7/30/2018	-	
		GAMW-53B	7/30/2018	-	
		GAMW-54	7/30/2018	-	
		GAMW-54B	7/27/2018	-	
		GAMW-55	7/26/2018	6/8/2019	Decommissioned due to well casing damage[4]
		GAMW-55R	6/8/2019	-	Installed to replace GAMW-55[4]
		GAMW-55B	7/26/2018	-	Installed to characterize the nature and extent of a potential release[2]
		GAMW-56	7/27/2018	-	
		GAMW-56B	7/27/2018	-	
		GAMW-46	5/15/2018	-	Installed to monitor groundwater quality at the property boundary[3]
		GAMW-46B	5/15/2018	-	

Notes:

1) Per 40 CFR §257.93, Golder collected eight rounds of background data prior to October 17, 2017.

2) Per 40 CFR §257.95(g)(1)(i) Rule requirements, Golder collected additional data to further characterize the nature and extent of potential groundwater impacts.

3) Per 40 CFR §257.95(g)(1)(iii), Golder collected data to monitor groundwater quality in the direction of flow at the property boundary

4) Golder field personnel were unable to collect a groundwater sample from monitoring well GAMW-55 during the April 2019 Assessment Monitoring sampling event due to surface damage (i.e., tubing above the permanent pump was pinched at less than 10 feet below ground surface). The well was replaced with GAMW-55R in June 2019.

5) Monitoring well GAMW-16 was completely removed during construction excavation activities in 2020. No decommissioning was required. The well was replaced with GAMW-16R in September 2020.

6) Monitoring well GAMW-16B was decommissioned during construction activities in 2020. The well was replaced with GAMW-16BR in September 2020.

NA= Not applicable

Prepared by: KMC
Checked by: DFSC
Reviewed by: JSP

Table 2: Summary of Sampling Events
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Well Purpose	Monitoring Well ID	Sample Event #16	Sample Event #17	Total Number of Samples
Purpose of Sample		Annual Assessment Monitoring	Semi-Annual Assessment Monitoring	
Sample Parameters		Appendix III and Appendix IV	Appendix III and Detected Appendix IV	
Background Monitoring Well	GAMW-04	4/15/2021	9/23/2021	2
	GAMW-07	4/16/2021	9/21/2021	2
	GAMW-07B	4/16/2021	9/23/2021	2
	GAMW-15	4/16/2021	9/22/2021	2
	GAMW-15B	4/16/2021	9/22/2021	2
Downgradient Monitoring Well	GAMW-08	4/22/2021	9/24/2021	2
	GAMW-08B	4/22/2021	9/24/2021	2
	GAMW-09	4/20/2021	9/23/2021	2
	GAMW-09B	4/20/2021	9/23/2021	2
	GAMW-16R	4/22/2021	9/21/2021	2
	GAMW-16BR	4/22/2021	9/21/2021	2
	GAMW-17	4/14/2021	9/22/2021	2
	GAMW-17B	4/14/2021	9/22/2021	2
	GAMW-18	4/20/2021	9/16/2021	2
	GAMW-18B	4/21/2021	9/17/2021	2
	GAMW-46	4/27/2021	9/15/2021	2
	GAMW-46B	4/27/2021	9/15/2021	2
	GAMW-52	4/16/2021	9/30/2021	2
	GAMW-52B	4/16/2021	9/30/2021	2
	GAMW-53	4/16/2021	9/30/2021	2
	GAMW-53B	4/16/2021	9/30/2021	2
	GAMW-54	4/19/2021	10/1/2021	2
	GAMW-54B	4/19/2021	10/1/2021	2
	GAMW-55R	4/20/2021	10/1/2021	2
	GAMW-55B	4/20/2021	10/1/2021	2
	GAMW-56	4/20/2021	10/4/2021	2
	GAMW-56B	4/21/2021	10/4/2021	2
Total Number of Samples		27	27	54

Notes:
Sample counts do not include QA/QC samples.
(1) Sample events #1-#15 were completed prior to 2021. The purpose, sample parameters, and sample dates are included in the 2017, 2018, 2019, and 2020 Annual Reports.
(2) Semi-annual assessment monitoring parameters did not include radium.
(3) Sample events #16 and 17 correspond to the seventh and eighth Assessment Monitoring events, respectively.

Prepared by: KMC
Checked by: DFSC
Reviewed by: JSP

Table 3: Analytical Data
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

Location		CAMW34			CAMW37			CAMW07E		CAMW09		CAMW09E		CAMW09		CAMW09B			CAMW15	
Sample Date		2021-04-15	2021-09-23		2021-04-16	2021-09-21		2021-04-16	2021-09-23	2021-04-22	2021-09-24	2021-04-22	2021-09-24	2021-04-20	2021-09-23	2021-04-20		2021-09-23	2021-04-16	2021-09-22
Sample Type		N	FD	N	N	FD	N	N	N	N	N	N	N	N	N	FD	N	N	N	N
Chemical Name	Unit																			
CCR Appendix III																				
Boron	mg/L	1.1	0.36	0.35	0.81	0.91	0.85	5.9	6.9	0.89	1.1	7.7	8.4	3.5	3.8	8.1	6.2	6.7	8 D	3.5
Calcium	mg/L	173	108	107	198	215	212	327	373	266	260	196	235	166	227	189	177	183	180 D	136
Chloride	mg/L	9.2	3.7	3.6	11.7	11.9	12	38	60.3	50	14.9	175	179	41.8	64.7	102	64	113	99.3 D	49.6
Fluoride	mg/L	0.2	0.35	0.35	0.66	0.85	0.85	0.79	0.85	0.97	0.44	0.9	0.73	0.26	0.54	1.4	1.4	1.3	0.76 D	0.77 J-
pH	SU	7.26		7.4	7.14		7.14	7.94	7.58	7.04	7.04	7.49	7.44	8.48 D	7.51		10.49 D	7.56	7.1 D	7.12
Sulfate	mg/l	375	116	121	352	362	358	1010	1060	477	841	751	1060	418	909	582 J	1040 J	773	371 D	265
Total Dissolved Solids	mg/L	720	381	380	840	887	894	1700	1790	1120	2380	1620	2040	959	1040	1030	952	1430	770 D	675
CCR Appendix IV																				
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 UQ	0.001 U
Arsenic	mg/l	0.0018	0.0041	0.0036	0.001 U	0.0012	0.0013	0.0022	0.0022	0.001 U	0.0013	0.001 U	0.001 U	0.001 U	0.001 U	0.0033	0.0034	0.0031	0.046 D	0.09
Barium	mg/L	0.079	0.057	0.056	0.048	0.053	0.052	0.041	0.037	0.07	0.076	0.039	0.046	0.037	0.053	0.039	0.035	0.059	0.038 D	0.05
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UQ	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.00022	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UQ	0.0002 U
Chromium	mg/l	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 UQ	0.007 U
Cobalt	mg/L	0.0016	0.001 U	0.001 U	0.0026	0.0061	0.006	0.0011	0.004 U	0.017	0.015	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.003 D	0.0021
Fluoride	mg/L	0.2	0.35	0.35	0.66	0.85	0.85	0.79	0.85	0.97	0.44	0.9	0.73	0.26	0.54	1.4	1.4	1.3	0.76 D	0.77 J-
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 UQ	0.001 U
Lithium	mg/l	0.008 U	0.008 U	0.008 U	0.008 U	0.0091	0.0085	0.008 U	0.013	0.012	0.015	0.012	0.014	0.008 U	0.008 U	0.008 U	0.008 U	0.0095	0.008 UQ	0.01
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UQ	0.0002 U
Molybdenum	mg/L	0.066	0.015	0.016	0.0078	0.01	0.01	0.029	0.023	0.034	0.043	0.011	0.01	0.04	0.058	0.012	0.012	0.015	0.023 D	0.027
Radium, Total	pci/l	0.859 U			1.29 U			2.16		1.87		2.53		0.619 U		0.934 U	1.67 J		0.191 UQ	
Selenium	mg/l	0.0033	0.001 U	0.001 U	0.0068	0.0044	0.0039	0.001 U	0.004 U	0.01	0.005	0.001 U	0.001 U	0.0053	0.0079	0.001 U	0.001 U	0.001 U	0.0036 D	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.002 U	0.001 U	0.002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 UQ	0.001 U
Field Parameters																				
Dissolved Oxygen	mg/L	1.71		0.31	0.39		0.25	0.23	0.26	1	0.35	0.29	0.27	3.42	6.2		6.2	0.31	0.2	0.26
Oxidation-Reduction Potential	millivolts	-23		0.149	55.3		0.1	-174.1	0.274	22	19.3	-170.1	0.218	-20.8	0.2		-115.1	0.204	-84.1	0.195
pH	SU	7.26		7.4	7.14		7.14	7.94	7.58	7.04	7.04	7.49	7.44	8.48	7.51		10.49	7.56	7.1	7.12
Specific Conductance	uS/cm	950		595	1064		123	1970	222.4	1452	167.2	2157	286.3	970	138.1		1159	201.2	1153	104.8
Temperature	deg c	9.24		15.9	11.06		17	12.2	14.7	11.2	18.6	13	15.2	10.6	18.7		13.4	16.4	14.33	19.2
Turbidity	ntu	4.87		7.08	5.4		7.85	2.8	4.84	1.89	1.46	2.78	3.9	1.02	2.85		4.28	3.02	9.87	6.36

Notes:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
pCi/L = picocuries per liter
SU = Standard Units
"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample, the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"R" = Indicates the result is unusable. The sample result was rejected due to serious deficiencies in meeting quality control criteria, the analyte may or may not be present in the sample.
"O" = Indicates result is an outlier.

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Table 3: Analytical Data
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

	Location	CAMW15B			CAMW16R		CAMW16BR		CAMW17		CAMW17B		CAMW18		CAMW18B			CAMW46	
	Sample Date	2021-04-15		2021-09-23	2021-04-22	2021-09-21	2021-04-22	2021-09-21	2021-04-14	2021-09-22	2021-04-14	2021-09-22	2021-04-20	2021-09-16	2021-04-21	2021-09-17		2021-04-27	2021-09-15
	Sample Type	FD	N	N	N	N	N	N	N	N	N	N	N	N	N	FD	N	N	N
Chemical Name	Unit																		
CCR Appendix III																			
Boron	mg/L	32.7 O	32.5 O	28.1	3.6 O	4.1	21.8 O	25.3	1.3	12.5	10.2	7.3	3.1	5.9	8.4	8.2	8.2	0.1 U	0.1 U
Calcium	mg/L	355 O	321 O	352	410 C	275	380 O	265	139	346	164	155	436	466	317	325	323	29	25.3
Chloride	mg/L	372 O	390 O	269	61.1 O	112	331 O	516	79	176	136	105	40.3	97	112	90.8	89.3	2.1	2.1
Fluoride	mg/L	0.37 O	0.35 O	0.44 J-	0.39 O	0.57	0.41 O	2.6	1.2	1.3 J-	0.3	0.49 J-	0.16	0.18 J-	0.35	0.6	0.5	0.078	0.11
pH	SU		7.15 O	7.08	7.16 O	7.1	7.21 O	7.5	7.3	7.18	7.84	7.6	10.36 O	7.1	7.51		7.34	8.36	8.16
Sulfate	mg/l	566 O	643 O	900	1060 O	633	723 O	2570	358	964	549	965	1310	1160	1760	1100	1120	33 J+	31.8
Total Dissolved Solids	mg/L	1740 O	1670 O	2030	1850 C	1270	2080 C	3870	800	1890	1200	928	1440	2C20	3340	1830	2010	112	127
CCR Appendix IV																			
Antimony	mg/L	0.001 UO	0.001 UO	0.001 U	0.001 UO	0.001 U	0.001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/l	0.001 UO	0.001 UO	0.001 U	0.0047 O	0.0086	0.001 UO	0.0042	0.0074	0.0027	0.0012	0.0021	0.001 U	0.001 U	0.0035	0.0028	0.0027	0.001 U	0.001 U
Barium	mg/L	0.18 C	0.18 O	0.17	0.074 O	0.09	0.073 O	0.041	0.059	0.17	0.084	0.053	0.044	0.057	0.041	0.028	0.029	0.025	0.0044
Beryllium	mg/L	0.0002 UO	0.0002 UO	0.0002 U	0.0002 UO	0.0002 U	0.0002 UO	0.0002 U	0.0002 U	0.0002 J	0.0002 U	0.0002 J	0.0002 U	0.0002 J	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 UO	0.0002 UO	0.0002 U	0.0002 UO	0.0002 U	0.0002 UO	0.0002 U	0.0002 U	0.0002 J	0.0002 U	0.0002 J	0.0002 U	0.0002 J	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/l	0.002 UO	0.002 UO	0.002 U	0.002 UO	0.002 U	0.002 UO	0.0025	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.0011 O	0.001 O	0.001 U	0.0064 O	0.0036	0.001 UO	0.001 U	0.0012	0.001 U	0.0015	0.001 U	0.001 U	0.0011	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.37 O	0.35 O	0.44 J-	0.39 O	0.57	0.41 O	2.6	1.2	1.3 J-	0.3	0.49 J-	0.16	0.18 J-	0.35	0.6	0.5	0.078	0.11
Lead	mg/L	0.001 UO	0.001 UO	0.001 U	0.001 UO	0.001 U	0.001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/l	0.011 O	0.012 O	0.028	0.008 UO	0.011	0.033 O	0.031	0.008 U	0.021	0.008 U	0.008 U	0.008 U	0.011	0.037	0.031	0.026	0.008 U	0.008 U
Mercury	mg/L	0.0002 UO	0.0002 UO	0.0002 U	0.0002 UO	0.0002 U	0.0002 UO	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0012 O	0.0012 O	0.0029	0.027 O	0.013	0.001 UO	0.043	0.012	0.01	0.0058	0.012	0.082	0.14	0.074	0.03	0.031	0.001 U	0.001 U
Radium, Total	pci/l	2.99 C	2.15 O		0.868 UO		2.06 O		1.05 U		1.47 U		0.538 U		2.14			1.28 U	
Selenium	mg/l	0.001 UO	0.001 UO	0.001 U	0.001 UO	0.001 U	0.001 UO	0.0013	0.01	0.0036	0.001 U	0.001 U	0.042	0.028	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 UO	0.001 UO	0.001 U	0.001 UO	0.001 U	0.001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																			
Dissolved Oxygen	mg/L		0.36	0.32	0.27	0.29	0.28	0.31	2.52	3.75	0.2	0.29	6.82	5.39	0.25		0.19	1.59	1.26
Oxidation-Reduction Potential	millivolts		-85.7	0.184	-78.9	0.208	-85.1	0.212	29.8	10.2	-117.5	0.215	-84.3	56.6	-104.5		0.182	109.8	-130
pH	SU		7.15	7.08	7.16	7.1	7.21	7.5	7.3	7.18	7.84	7.6	10.36	7.1	7.51		7.34	8.36	8.16
Specific Conductance	uS/cm		2491	2866	2025	1865	2510	7065	1152	2365	1778	1389	1899	2469	2494		2473	2382	235
Temperature	deg c		17.5	17	15.08	25	16.38	16.5	11.85	21.8	15.18	18.7	10.29	21.4	17.15		15.8	10.7	15.1
Turbidity	ntu		1.1	1.7	4.65	1.79	2.82	26.19	1.25	1.47	1.44	4.92	2.84	3.74	4.19		4.58	1.73	3.21

Notes:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
pCi/L = picocuries per liter
SU = Standard Units
"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample, the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"R" = Indicates the result is unusable. The sample result was rejected due to serious deficiencies in meeting quality control criteria, the analyte may or may not be present in the sample.
"O" = Indicates result is an outlier.

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Table 3: Analytical Data
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

	Location	CAMW48B		CAMW52		CAMW52B		CAMW53		CAMW53B		CAMW54		CAMW54B		CAMW55R	
	Sample Date	2021-04-27	2021-09-15	2021-04-16	2021-09-30	2021-04-16	2021-09-30	2021-04-16	2021-09-30	2021-04-16	2021-09-30	2021-04-19	2021-10-01	2021-04-19	2021-10-01	2021-04-20	2021-10-01
	Sample Type	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Chemical Name	Unit																
CCR Appendix III																	
Boron	mg/L	0.1 U	0.1 U	0.1	0.1	1.2	0.61	0.1 U	0.1 U	1.9	2.7	0.5	0.53	3.1	3.1	0.87	1.7
Calcium	mg/L	54.3	51	59.8	62.5	94.9	120	17.5	28.3	142	128	164	114	256	190	237	197
Chloride	mg/L	5.9	5.4	16.7	15.9	131	135	2.4	2.7	84.8	66.4	23.9	24.6	83.9	70.4	51.4	44.1
Fluoride	mg/L	0.077	0.12	0.22	0.3*	0.24	0.38	0.05 U	0.05 U	0.4	0.46	0.2	0.5	0.53	0.52	0.46	0.51
pH	SU	7.69	7.73	7.6	7.6	7.46	7.57	5.76	6.17	7.28	7.48	6.52	6.52	7.3	7.36	7.6	7.27
Sulfate	mg/L	61 B,J+	55.3	55.8	50	181	156	35.7	49.4	904	795	492	191	891	501	867	589
Total Dissolved Solids	mg/L	190	243	269	270	573	667	97	147	746	802	730	503	1120	1030	842	943
CCR Appendix IV																	
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0013	0.0012	0.0017	0.001 U	0.0014	0.0075	0.004	0.0044	0.004	0.001 U	0.001 U
Barium	mg/L	0.026	0.023	0.011	0.014	0.13	0.14	0.027	0.033	0.097	0.051	0.071	0.048	0.033	0.056	0.032	0.038
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0011	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	0.077	0.12	0.22	0.3*	0.24	0.38	0.05 U	0.05 U	0.4	0.46	0.2	0.5	0.53	0.52	0.46	0.51
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.01
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0018	0.0018	0.0021	0.0025	0.013	0.011	0.0052	0.0097	0.016	0.011	0.011	0.025	0.017	0.025	0.013	0.017
Radium, Total	pci/l	1.66 U		0.29 U		1.05 U		0 U		1.21 U		0.894 U		1.43		1.47 R	
Selenium	mg/L	0.001 U	0.001 U	0.0011	0.001 U	0.001 U	0.001 U	0.001 U	0.0018	0.001 U	0.001 U	0.0044	0.001 U	0.001 U	0.001 U	0.0029	0.0048
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																	
Dissolved Oxygen	mg/L	0.64	0.2	0.91	0.56	0.42	0.28	1.99	0.92	0.39	0.24	0.63	0.29	0.45	0.26	1.19	0.47
Oxidation-Reduction Potential	millivolts	-101.9	-241	-231	0.38	-175.5	0.741	111.7	94.9	-104	-232.6	61.7	-163.5	-135.3	-211.7	32.3	-16.8
pH	SU	7.69	7.73	7.6	7.6	7.46	7.57	5.76	6.17	7.28	7.48	6.52	6.52	7.3	7.36	7.6	7.27
Specific Conductance	uS/cm	351	388	545	601	1159	1104	173	201	1227	1256	1097	782	1626	1494	1319	1391
Temperature	deg c	11.37	12.2	12	20	15.8	18	12	20.4	17.6	20	11.8	20.1	14.3	17.3	11.3	20.6
Turbidity	ntu	4.98	4.5	1.79	1.36	5.9	1.27	4.66	4.5**	3.27	3.67	8.79	3.79	8.74	8.54	2.35	1.58

Notes:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
pCi/L = picocuries per liter
SU = Standard Units
"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample, the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"R" = Indicates the result is unusable. The sample result was rejected due to serious deficiencies in meeting quality control criteria, the analyte may or may not be present in the sample.
"O" = Indicates result is an outlier.

Table 3: Analytical Data
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

	Location	CAMW55B		CAMW56		CAMW56B	
	Sample Date	2021-04-20	2021-10-01	2021-04-20	2021-10-04	2021-04-21	2021-10-04
	Sample Type	N	N	N	N	N	N
Chemical Name	Unit						
CCR Appendix III							
Boron	mg/L	9.9	8.3	0.23	0.19	1.8	1.7
Calcium	mg/L	254	235	139	108	157	163
Chloride	mg/L	120	78.4	2.9	1.7	70.9	73.7
Fluoride	mg/L	0.3	0.3	0.35 J	1	0.41	0.46
pH	SU	7.7	7.44	7.05	7.09	7.55	7.34
Sulfate	mg/L	565	435	57.6	64.8	277	265
Total Dissolved Solids	mg/L	1370	1120	480	378	738	602
CCR Appendix IV							
Antimony	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	mg/L	0.001 U	0.001 U	0.007	0.0018	0.001 U	0.001 U
Barium	mg/L	0.061	0.05	0.042	0.04	0.071	0.081
Beryllium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.016	0.0043	0.001 U	0.001 U
Fluoride	mg/L	0.3	0.3	0.35 J	1	0.41	0.46
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.012	0.008 U	0.008 U	0.008 U	0.0091
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0068	0.0053	0.0063	0.011	0.0074	0.0082
Radium, Total	pCi/l	1.69 U		0.222 U		2.97	
Selenium	mg/L	0.001 U	0.001 U	0.001	0.001 U	0.001 U	0.001 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters							
Dissolved Oxygen	mg/L	0.65	0.26	1	0.37	0.23	0.29
Oxidation-Reduction Potential	millivolts	-97.9	-215.9	65.8	-133.7	-110.5	-214.1
pH	SU	7.7	7.44	7.05	7.09	7.55	7.34
Specific Conductance	uS/cm	1596	1823	700	655	1100	1214
Temperature	deg.c	15.3	18.7	9	17.2	12	14.3
Turbidity	ntu	4.78	4.48	2.87	3.68	6.72	4.65

Notes:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
pCi/L = picocuries per liter
SU = Standard Units
"U" = Indicates the result was not detected above the method detection limit. (MDL) for the sample, the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"R" = Indicates the result is unusable. The sample result was rejected due to serious deficiencies in meeting quality control criteria, the analyte may or may not be present in the sample.
"O" = Indicates result is an outlier.

Prepared by: SLG
Checked by: DFSC
Reviewed by: JSP

GOLDER

Table 4: Groundwater Protection Standards
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

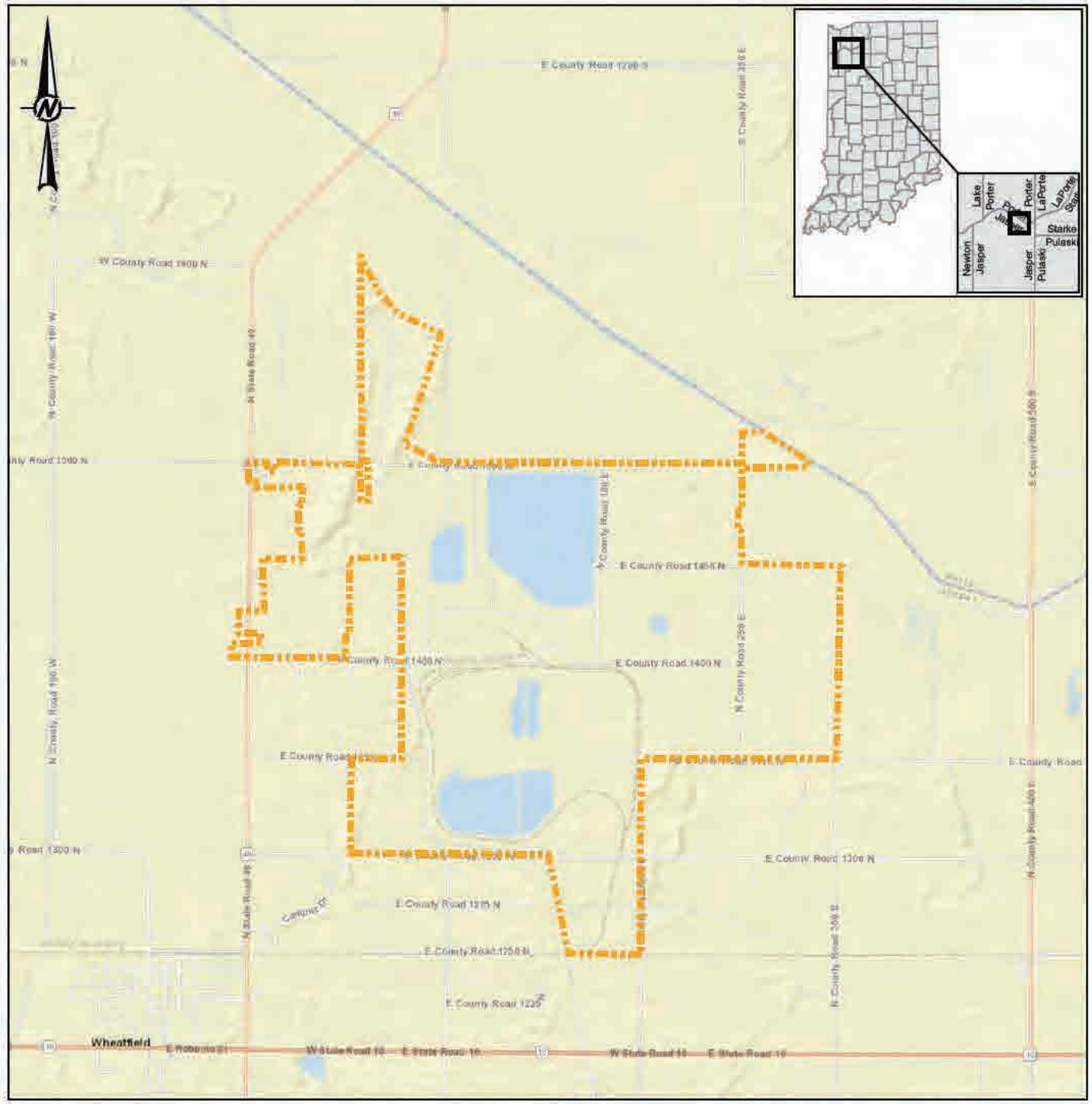
Analyte	MCL (mg/L)	GWPS (mg/L)[2]	GWPS (mg/L)[3]
Antimony	0.006	0.006	0.006
Arsenic	0.01	0.078	0.091
Barium	2	2	2
Beryllium	0.004	0.004	0.004
Cadmium	0.005	0.005	0.005
Chromium	0.1	0.1	0.1
Cobalt[1]	0.006	0.01	0.01
Fluoride	4	4	4
Lead[1]	0.015	0.015	0.015
Lithium[1]	0.04	0.04	0.04
Mercury	0.002	0.002	0.002
Molybdenum[1]	0.1	0.1	0.1
Radium 226+228	5	5	5
Selenium	0.05	0.05	0.05
Thallium	0.002	0.002	0.002

Notes:
MCL= Environmental Protection Agency Maximum Contaminant Level
GWPS= Groundwater Protection Standard
mg/L= milligrams per liter

1) As of August 29, 2018, these four constituents have health-based standards that can be used when calculating the GWPS, these health-based standards are not MCLs but are provided in the MCL column.
2) GWPS calculated in August 2018.
3) GWPS calculated in March 2020.

Prepared by: KMC
Checked by: DFSC
Review by: JSP

FIGURES



LEGEND

Approximate Property Line

0 0.75 1.5

1 " = 0.75 miles Miles

REFERENCE(S)

SERVICE LAYER CREDITS: SOURCES: ESRI, HERE, GARMIN, USGS, NTERMAP, INCREMENT P, NRCAN, ESRI JAPAN, METI, ESRI CH NA (HONG KONG), ESRI KOREA, ESRI (THAILAND), NGCC, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

SITE LOCATION MAP

CONSULTANT

GOLDER
MEMBER OF WSP

YYYY-MM-DD	1/4/2021
DESIGNED	DFS
PREPARED	SHL
REVIEWED	JSP
APPROVED	MAH

PROJECT NO.	CONTROL	REV.	FIGURE
19121567	A	0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI A



Assessment Monitoring Well

Background Monitoring Well

Downgradient Monitoring Well

Generalized Groundwater Flow Direction

CCR Units

Approximate Property Line

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

WELL LOCATION MAP
MATERIAL STORAGE RUNOFF BASIN, METAL CLEANING WASTE BASIN, AND DRYING AREA

GOLDER
MEMBER OF WSP

DESIGNED DPS

APPROVED MM

19121567 A 0 2



golder.com

GOLDER
MEMBER OF WSP

2021 Annual Groundwater Monitoring and Corrective Action Report Landfill Phase V, Phase VI, and Phase VII

NIPSCO LLC R. M. Schahfer Generating Station

Prepared Pursuant to 40 CFR §257.90(e) and Corresponding Regulations under 329 Indiana Administrative Code 10-9-1

Submitted to:

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

Submitted by:

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January 31, 2022

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RMSGS Landfill Phases V, VI, and VII Alternative Source Demonstration March 2021

APPENDIX B
RMSGS Landfill Phases V, VI, and VII Alternative Source Demonstration October 2021

1.0 INTRODUCTION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates USA Inc., *a member of WSP* (Golder), prepared this 2021 Annual Groundwater Monitoring and Corrective Action Report (2021 Annual Report) for the Rollin M. Schahfer Generating Station (RMSGS, Schahfer) Landfill Phases V, VI, and VII (together, the CCR Unit) located at 2723 E 1500 N in Wheatfield, Jasper County, Indiana (Latitude 41° 12' 36" N and Longitude 87° 01' 48" W, see Figure 1). The three landfill phases include:

- Phase V is an approximately 18-acre cell that stopped receiving CCR on April 1, 2017
- Phase VI is an approximately 15-acre cell located due north of Phase V, which began receiving CCR on August 1, 2016 and stopped receiving CCR on June 25, 2021
- Phase VII is an approximately 14-acre lined cell located immediately north of Phase VI, which began receiving waste on June 24, 2021. NIPSCO designed Phase VII to meet the CCR Rule liner requirements.

Closed, non-regulated (under the CCR Rule) Schahfer Landfill Phases I through IV are primarily located east of the CCR Rule-regulated landfill cells as shown in Figure 2. Golder prepared the 2021 Annual Report in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, “Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities; Final Rule” (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

To comply with the CCR Rule, NIPSCO and Golder decided to monitor Phases V, VI, and VII as one CCR Unit due to the design, construction, and proximity of historical non-regulated landfill cells (i.e., Phases II and III) and because there is no practical means of monitoring groundwater between the three CCR landfill cells (i.e., Phases V, VI, and VII). NIPSCO updated the monitoring well network in 2018 concurrent with construction of Phase VII. The CCR Unit is currently in Detection Monitoring pursuant to 40 CFR §257.94. Routine monitoring activities performed during the reporting period include inspection of wells for integrity and security, measurement of groundwater levels prior to sample collection to assess groundwater flow direction, and collection of samples for laboratory analysis.

In conformance with the applicable requirements of 40 CFR §257.90(e)(1) through (5) and corresponding State of Indiana requirements, the 2021 Annual Report:

- Documents the status of the groundwater monitoring and corrective action program
- Provides figures showing the CCR Unit and monitoring well locations
- Summarizes key CCR Rule groundwater activities completed during calendar year 2021
- Includes CCR Rule groundwater monitoring data obtained in calendar year 2021
- Describes any problems encountered during monitoring activities
- Discusses actions taken to resolve the problems, if applicable
- Projects key activities for the upcoming year

2.0 GROUNDWATER MONITORING AND CORRECTIVE ACTION PROGRAM OVERVIEW OF CURRENT STATUS

Starting in 2016 following the installation of a groundwater monitoring system (Table 1) and throughout calendar years 2017 and 2018, Golder collected background groundwater samples and performed Detection Monitoring at the CCR Unit pursuant to the requirements of 40 CFR §257.94. Following the identification of statistically significant increases (SSIs) in January 2018, Golder prepared an alternative source demonstration (ASD) in April 2018, consequently, the CCR Unit remained in Detection Monitoring. Golder performed the fourth and fifth Detection Monitoring sampling events in 2019, the sixth and seventh Detection Monitoring sampling events in 2020, and the eighth and ninth Detection Monitoring events in 2021. The sampling dates, number of groundwater samples collected from each background and downgradient well, and the purpose of sampling associated with the eighth and ninth Detection Monitoring events are provided in Table 2. The 2021 analytical results are presented in Table 3. The SSIs identified in 2021 are summarized in the embedded table below.

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH[1]	TDS
GAMW26				X			
GAMW27	X	X			X		X
GAMW27B	X	X	X		X		X
GAMW38B	X	X			X		X
GAMW39B	X	X	X		X		X
GAMW40	X	X					X
GAMW40B	X		X		X	X	X
GAMW41	X		X		X		X
GAMW41B	X	X	X		X		X

"X" represents an SSI
1 = pH value is based on field water quality meter reading

Pursuant to 40 CFR §257.94, a qualified Indiana-licensed professional engineer recertified the ASD in March and October 2021; thus, the CCR Unit began and ended the current annual reporting period in Detection Monitoring. Based upon groundwater monitoring results collected pursuant to the CCR Rule to date, no corrective measures program requirements as outlined in 40 CFR §257.96-98 have either been triggered or implemented at the CCR Unit.

2.1 Key Actions Completed - 2021

NIPSCO completed the following key actions relative to CCR Rule groundwater monitoring at the CCR Unit during calendar year 2021:

- Preparation of the of 2020 Groundwater Monitoring and Corrective Action Annual Report in January 2021 (2020 Annual Report, 40 CFR §257.90(e))

- Recertification of the RMSGS Landfill Phases V, VI, and VII Alternative Source Demonstration (ASD) in March 2021 (40 CFR §257.94(e))
- Performance of the eighth Detection Monitoring event in April 2021 (40 CFR §257.94)
- Evaluation of the results of the eighth Detection Monitoring event in July 2021 (40 CFR §257.95(d))
- Performance of the ninth Detection Monitoring event in September 2021 (40 CFR §257.94)
- Recertification of the RMSGS Landfill Phases V, VI, and VII ASD in October 2021 (40 CFR §257.94(e))
- Evaluation of the results of the ninth Detection Monitoring event in December 2021 (40 CFR §257.95(d))

2.2 Monitoring System Modifications

The groundwater monitoring system did not require any modifications in 2021 (see Figure 2). Table 1 provides a summary of the well rationale/purpose and date of installation. An overview of the groundwater monitoring network is provided below.

Background Monitoring Wells	Downgradient Monitoring Wells	Decommissioned Monitoring Wells
GAMW-20, GAMW-24, GAMW-24B, GAMW-25, GAMW-25B	GAMW-26, GAMW-26B, GAMW-27, GAMW-27B, GAMW-38, GAMW-38B, GAMW-39, GAMW-39B, GAMW-40, GAMW-40B, GAMW-41, GAMW-41B	GAMW-21, GAMW-21B, GAMW-22, GAMW-22B, GAMW-23, GAMW-23B, GAMW-28, GAMW-28B

2.3 Background Monitoring (2016 to 2017)

Per the requirements of 40 CFR §257.94, Golder collected eight independent background groundwater samples from each background and downgradient well between July 2016 and August 2017. Golder used the results of the background monitoring phase to develop appropriate, statistically valid background values for each constituent/monitoring well. Golder submitted the samples to a contract laboratory, in accordance with chain of custody and quality assurance/quality control procedures, for analysis of 40 CFR Part 257 Appendix III and Appendix IV constituents. In addition, Golder personnel measured field water quality parameters including specific conductance, temperature, dissolved oxygen, turbidity, oxidation-reduction potential, and pH. The background data set is included in the 2017 Annual Groundwater Monitoring and Corrective Action Report, dated January 31, 2018 (2017 Annual Report, Golder 2018).

Golder performed a periodic update of background datasets, which includes incorporation of additional background data, to improve statistical power and accuracy by providing a more conservative estimate of the true background populations. The CCR Rule Groundwater Monitoring Program Implementation Manual (GMPIM, Golder 2017) allows for the statistical limits to be updated after four to eight new measurements are available (i.e., every two to four years of semi-annual monitoring). Golder incorporated new data into the background dataset, updating the prediction limits, in June 2019 and July 2021.

2.4 Detection Monitoring

Golder performed the first Detection Monitoring event in October 2017, followed by a statistical evaluation and data analysis in January 2018. Golder collected groundwater samples from Landfill Phases V and VI background and downgradient monitoring wells for analysis of Appendix III constituents per 40 CFR §257.94 and included the results in the 2017 Annual Report. Following receipt and validation of laboratory results, Golder evaluated the results of the first Detection Monitoring sampling event to compare the concentration of 40 CFR Part 257 Appendix III constituents relative to facility background concentrations. Using Sanitas™ software, Golder pooled the background data to calculate prediction limits and compared the October 2017 results to the calculated prediction limits to identify SSIs.

Golder determined that SSIs existed for Phases V and VI in January 2018. Golder identified a potential alternative source that could explain the SSIs and prepared an ASD. A qualified Indiana-licensed professional engineer certified the ASD in April 2018. The ASD supports the findings that the SSIs determined in January 2018 do not result from a release from the CCR Unit. The key supporting lines of evidence described in the ASD indicate that the closed, non-regulated phases of the landfill (i.e., Phases I and II) are the source of the SSIs. Therefore, no further action (i.e., Assessment Monitoring) was warranted, and Phases V and VI appropriately remained in Detection Monitoring. The ASD is presented in Appendix A of the 2018 Annual Groundwater Monitoring and Corrective Action Report, dated January 31, 2019 (2018 Annual Report, Golder 2019).

Golder performed the second and third Detection Monitoring events in 2018, the fourth and fifth detection monitoring events in 2019, and the sixth and seventh Detection Monitoring events in 2020. After each Detection Monitoring event, Golder determined that SSIs existed. Consistent with the previous evaluation, Golder identified a potential alternative source that explained the SSIs and a qualified Indiana-licensed professional engineer recertified the ASD, confirming that Phases V, VI, and VII remain in Detection Monitoring.

Golder performed the seventh Detection Monitoring event in September 2020 followed by a statistical evaluation and data analysis in December 2020 that determined that SSIs existed for Phases V, VI, and VII. Consistent with previous evaluations, Golder identified a potential alternative source that explained the SSIs. A qualified Indiana-licensed professional engineer recertified the ASD in March 2021 (Appendix A), confirming Phases V, VI, and VII appropriately remain in Detection Monitoring. The results from the second to seventh Detection Monitoring events and the corresponding ASDs are included in the 2018, 2019, and 2020 Annual Groundwater Monitoring and Corrective Action Reports (Golder 2019, 2020, 2021).

Golder performed the eighth Detection Monitoring event in April 2021 followed by a statistical evaluation and data analysis in July 2021 that determined that SSIs existed for Phases V, VI, and VII. Consistent with previous evaluations, Golder identified a potential alternative source that explained the SSIs. A qualified Indiana-licensed professional engineer recertified the ASD in October 2021 (Appendix B), confirming Phases V, VI, and VII appropriately remain in Detection Monitoring. The SSIs from the eighth Detection Monitoring event are summarized in the table below by downgradient monitoring well and constituent.

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH[1]	Total Dissolved Solids
GAMW26				X			
GAMW27	X	X			X		X
GAMW27B	X	X	X		X		X
GAMW38B	X	X			X		X
GAMW39B	X	X	X		X		X
GAMW40		X					X
GAMW40B	X		X		X	X	X
GAMW41	X		X		X		X
GAMW41B	X		X		X		X

"X" represents an SSI
1 = pH value is based on field water quality meter reading

Golder performed the ninth Detection Monitoring event in September 2021 followed by a statistical evaluation and data analysis in December 2021 that determined that SSIs existed for Phases V, VI, and VII. The SSIs are summarized in the table below by downgradient monitoring well and constituent.

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH[1]	Total Dissolved Solids
GAMW-27	X	X			X		X
GAMW-27B	X	X	X		X		X
GAMW-38B	X	X			X		X
GAMW-39B	X	X	X		X		X
GAMW-40	X	X					X
GAMW-40B	X		X		X		X
GAMW-41	X				X		X
GAMW-41B	X	X	X		X		X

"X" represents an SSI
1 = pH value is based on field water quality meter reading

2.5 Statistical Evaluation

Subsequent to each monitoring event, Golder assessed the analytical data for outliers, anomalies, and trends that may be an indication of a sampling or analytical error. Outliers and anomalies are generally defined as inconsistently large or small values that can occur because of sampling, laboratory, transportation, or transcription errors, or even by chance alone. Significant trends may indicate natural geochemical variability, a source of systematic error, influence of an upgradient/off-site source, or an actual occurrence of CCR Unit influence upon groundwater quality. Appropriate statistical methods are used to remove outliers from the database and manage trends with detrending routines, prior to the calculation of statistical limits. To assess the data for outliers, anomalies, and trends, Golder assessed the data using time vs. concentration graphs, and statistical routines included in the Sanitas™ statistical analysis software package. Golder did not identify any new outliers since the 2020 Annual Report.

Golder will continue to monitor trends and, if the CCR Unit enters Assessment Monitoring, detrending routines will be performed before using these data to calculate groundwater protection standards (GWPS).

2.6 Problems Encountered and Follow-Up Corrective Actions

In the eighth Detection Monitoring event (April 2021), Golder collected a groundwater sample from GAMW-24B at a turbidity level of approximately 7.77 nephelometric turbidity units (NTUs) and from GAMW-38 at approximately 7.49 NTUs. In the ninth Detection Monitoring event (September 2021), Golder collected a groundwater sample from GAMW-20 at a turbidity of approximately 5.22 NTUs and from GAMW-24B at approximately 5.64 NTUs. According to the CCR Groundwater Monitoring Program Implementation Manual (Golder 2017), groundwater samples are to be collected once a well has achieved a turbidity level below 5 NTUs. Due to time constraints in the field, groundwater is purged for a minimum of two hours and sampled when turbidity appeared to stabilize (e.g., no downward or upward trend over three consecutive readings five minutes apart). Evaluation of the analytical results from these wells suggests that the slightly elevated turbidity levels had no significant effect on the representativeness of the samples of groundwater quality. During future monitoring events, Golder will purge groundwater for two hours or five well volumes, whichever is shorter. Golder will use professional judgement to assess when the purge water is representative of groundwater for sampling. If an acceptable turbidity level cannot be achieved within a reasonable timeframe (e.g., three hours), Golder will redevelop the affected monitoring wells prior to the next sampling event.

3.0 KEY ACTIVITIES PROJECTED FOR 2022

During calendar year 2022, NIPSCO anticipates conducting the following key CCR Rule groundwater monitoring activities for the RMSGS Landfill Phases V, VI, and VII:

- Prepare and submit the appropriate notifications according to the CCR Rule
- Continue semi-annual Detection Monitoring groundwater sampling per CCR Rule requirements
- Inspect and maintain the monitoring system including wells, pumps, and equipment.

4.0 REFERENCES

Golder Associates, “2017 Annual Groundwater Monitoring and Corrective Action Report- Landfill Phase V and Phase VI NIPSCO R. M. Schahfer Generating Station”, January 31, 2018.

Golder Associates, “2018 Annual Groundwater Monitoring and Corrective Action Report- Landfill Phase V and Phase VI NIPSCO R. M. Schahfer Generating Station”, January 31, 2019.

Golder Associates, “2019 Annual Groundwater Monitoring and Corrective Action Report- Landfill Phase V and Phase VI NIPSCO LLC R. M. Schahfer Generating Station”, January 31, 2020.

Golder Associates, “2020 Annual Groundwater Monitoring and Corrective Action Report- Landfill Phase V, Phase VI, and Phase VII NIPSCO LLC R. M. Schahfer Generating Station”, January 31, 2021.

Golder Associates, “CCR Groundwater Monitoring Program Implementation Manual,” October 2017.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, August 28, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, April 13, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, March 21, 2019.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 6, 2019.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI – Alternative Source Demonstration”, May 7, 2020.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI – Alternative Source Demonstration”, September 29, 2020.

TABLES

Table 1: Monitoring Well Network
CCR Unit Schahfer Landfill Phases V, VI, and VII
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

CCR Unit	Well Purpose	Monitoring Well ID	Installation Date	Decommission Date (If Applicable)	Basis For Action
LANDFILL Phase V, Phase VI, and Phase VII	Background Monitoring Well	GAMW-20	5/27/2016	-	Installed for Groundwater Quality Monitoring[1]
		GAMW-24	9/26/2016	-	
		GAMW-24B	9/26/2016	-	
		GAMW-25	10/4/2016	-	
		GAMW-25B	10/5/2016	-	
	Downgradient Monitoring Well	GAMW-21	5/31/2016	4/5/2018	Abandoned due to Landfill Construction Activities[2]
		GAMW-21B	5/31/2016	4/5/2018	
		GAMW-22	5/31/2016	4/5/2018	
		GAMW-22B	6/2/2016	4/5/2018	
		GAMW-23	6/2/2016	4/6/2018	
		GAMW-23B	6/2/2016	4/6/2018	
		GAMW-28	9/29/2016	4/6/2018	
		GAMW-28B	9/29/2016	4/6/2018	
		GAMW-26	10/4/2016	-	Installed for Groundwater Quality Monitoring[1]
		GAMW-26B	10/4/2016	-	
		GAMW-27	10/3/2016	-	
		GAMW-27B	10/4/2016	-	
		GAMW-38	4/4/2018	-	Installed to Replace Abandoned Well[3]
		GAMW-38B	4/3/2018	-	
		GAMW-39	4/4/2018	-	
		GAMW-39B	4/4/2018	-	
		GAMW-40	4/5/2018	-	
		GAMW-40B	4/4/2018	-	
		GAMW-41	5/17/2018	-	
		GAMW-41B	5/17/2018	-	

Notes:
1) Per the CCR Rule requirements, Golder collected eight rounds of background data prior to October 17, 2017.
2) Monitoring well was abandoned due to the construction of landfill Phase VII.
3) Monitoring well was installed to replace an abandoned monitoring well. Well was first sampled in September 2018.

Prepared by: KMC
Checked by: DFSC
Reviewed by: MAH

Table 2: Summary of Sampling Events
CCR Unit Schahfer Landfill Phases V, VI, and VII
NIPSCO LLC Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Well Purpose	Monitoring Well ID	Sample Event #18	Sample Event #19	Total Number of Samples
Purpose of Sample		Detection Monitoring	Detection Monitoring	
Sample Parameters		Appendix III	Appendix III	
Background Monitoring Well	GAMW-20	4/12/2021	9/13/2021	2
	GAMW-24	4/12/2021	9/13/2021	2
	GAMW-24B	4/13/2021	9/13/2021	2
	GAMW-25	4/12/2021	9/10/2021	2
	GAMW-25B	4/12/2021	9/10/2021	2
	GAMW-26	4/12/2021	9/10/2021	2
	GAMW-26B	4/12/2021	9/10/2021	2
	GAMW-27	4/13/2021	9/10/2021	2
	GAMW-27B	4/13/2021	9/13/2021	2
	GAMW-38	4/13/2021	9/11/2021	2
	GAMW-38B	4/13/2021	9/11/2021	2
	GAMW-39	4/13/2021	9/11/2021	2
	GAMW-39B	4/13/2021	9/11/2021	2
	GAMW-40	4/14/2021	9/13/2021	2
	GAMW-40B	4/14/2021	9/13/2021	2
	GAMW-41	4/14/2021	9/13/2021	2
	GAMW-41B	4/13/2021	9/13/2021	2
Total Number of Samples		17	17	34

Notes:
Sample counts do not include QA/QC samples.

(1) Sample events #1-17 were completed prior to 2021. The purpose, sample parameters, and sample dates are included in the 2017, 2018, 2019, and 2020 Annual Reports.

(2) Sample events #18 and 19 correspond to the eighth and ninth Detection Monitoring events, respectively.

Prepared by: KMC
Checked by: DFSC
Reviewed by: JSP

Table 3: Analytical Data
CCR Unit R. M. Schahfer Landfill Phases V, VI, and VII
NIPSCO LLC R. M. Schahfer Schahfer Generating Station
Wheatfield, Indiana

Location		GAMW20		GAMW24			GAMW24B		GAMW25		GAMW25B			GAMW26		GAMW26B		GAMW27		
Sample Date		2021-04-12	2021-09-13	2021-04-12	2021-09-13		2021-04-13	2021-09-13	2021-04-12	2021-09-10	2021-04-12	2021-09-10		2021-04-12	2021-09-10	2021-04-12	2021-09-10	2021-04-13	2021-09-10	
Sample Type		N	N	N	FD	N	N	N	N	N	FD	N	N	N	N	N	N	FD	N	N
Chemical Name	Unit																			
CCR Appendix III																				
Boron	mg/L	2.8	3.7	0.1 U	0.12	0.1 U	0.1 U	0.1 U	0.17	0.15	0.13	0.13	0.13	0.18	0.22	0.21	0.21	4.2	4.1	4.1
Calcium	mg/L	164	249	80.2	83.3	86.8	46.9	51.3	78.4	72.5	94	94.2	97.4	84.7	92.6	93.3	103	276	279	277
Chloride	mg/L	11.4	11.2	18.5	21.6	22	3.3	4.1	4.3	2.7	8.7	8.6	7.2	11.5	4.2	14.6	23.1	20.9	20.4	14.2
Fluoride	mg/L	0.19	0.22	0.083	0.067	0.15	0.12	0.19	1.1	1.2 J-	0.18	0.18	0.13 J-	2.9	2.8 J-	0.18	0.11 J-	0.66	0.63	0.56 J-
pH	SU	7.17	7.2	7.68		7.34	7.58	7.91	7.27	7.4		7.16	7.36	7.51	7.54	7.79	7.8		7.55	7.65
Sulfate	mg/L	500	529	70	70	69.6	26.7	24	44.9	48.5	67.2	67.2	86.9	59.2	80.2	86.8	189	693	701	756
Total Dissolved Solids	mg/L	1050	1170	316	351	349	184	190	288	329	378	377	417	350	449	437	624	1250	1270	1400
Field Parameters																				
Dissolved Oxygen	mg/L	0.87	0.12	0.14		0.14	0.65	0.24	3.81	1.85		0.49	0.27	0.68	0.33	1.31	3.45		0.45	0.21
Oxidation-Reduction Potential	millivolts	-94	0.188	-14.8		0.129	-114.6	0.23	154.4	96.6		-127	0.185	59.2	-309.6	-0.1	-96.1		-118	0.18
pH	SU	7.17	7.2	7.68		7.34	7.58	7.91	7.27	7.4		7.16	7.36	7.51	7.54	7.79	7.8		7.55	7.65
Specific Conductance	uS/cm	1530	183.7	561		809	912.5	340	472.3	514		599	653	804	603	711	737		1558	170
Temperature	deg c	10.6	17.1	9.95		16.8	10.9	13.5	8.8	16		11	12.1	10	18.74	11.53	13.63		11.5	16.8
Turbidity	ntu	2.71	5.22	4.6		4.84	7.77	5.84	1.99	1.9		3	1.88	1.46	4.47	3.86	2.98		4.24	1.26

Notes:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.

"J-" = Indicates the result is estimated and may be biased low.

Table 3: Analytical Data
CCR Unit R. M. Schahfer Landfill Ph
NIPSCO LLC R. M. Schahfer Schahf
Wheatfield, Indiana

Location		GAMW27B		GAMW38		GAMW38B			GAMW39		GAMW39B		GAMW40		GAMW40B	
Sample Date		2021-04-13	2021-09-13	2021-04-13	2021-09-11	2021-04-13	2021-09-11		2021-04-13	2021-09-11	2021-04-13	2021-09-11	2021-04-14	2021-09-13	2021-04-14	2021-09-13
Sample Type		N	N	N	N	N	FD	N	N	N	N	N	N	N	N	N
Chemical Name	Unit															
CCR Appendix III																
Boron	mg/L	12.1	13.1	0.67	1	6.2	6.9	6.9	1.1	1.4	10.1	9.8	2.8	4.1	30	29.9
Calcium	mg/L	384	367	90.4	77.3	249	274	268	173	162	409	443	273	276	225	195
Chloride	mg/L	406	438	4.7	4.2	35.1	37.4	39.9	10.2	9.7	61.9	65.7	12.8	11.8	859	700
Fluoride	mg/L	0.05 U	0.05 U	0.15	0.15	0.05 U	0.05 U	0.05 U	0.14	0.12	0.05 U	0.5 U	0.067	0.072	0.79	0.05 U
pH	SU	7.41	7.36	7.44	7.03	7.11		6.68	7.12	6.83	7.16	6.68	7.19	6.62	8.5	7.87
Sulfate	mg/L	6190	6530	211	164	687	726	785	359	396	1140	1330	388	501	6420	6580
Total Dissolved Solids	mg/L	9960	10800	522	471	1400	1590	1550	816	865	2230	2690	1360	1550	9860	11500
Field Parameters																
Dissolved Oxygen	mg/L	1.27	1.19	0.15	0.53	0.21		0.33	0.14	0.43	0.16	0.48	0.3	0.46	0.23	0.3
Oxidation-Reduction Potential	millivolts	-95.5	-272.6	-82.5	-229.7	-65.2		-329.8	-42.6	-284	-47.6	310.6	-39.8	-304	-162.9	-288.3
pH	SU	7.41	7.36	7.44	7.03	7.11		6.68	7.12	6.83	7.16	6.68	7.19	6.62	8.5	7.87
Specific Conductance	uS/cm	12351	10440	816	716	1913		1747	1248	1109	2863	2913	1968	1933	13408	11500
Temperature	deg c	12.6	14.15	9.83	18.94	11.41		14.37	11.05	17.47	12.32		10	17.03	11.97	14.28
Turbidity	ntu	2.35	3.59	7.49	2.78	4.62		2.92	4.27	1.25	4.4	2.47	2.46	0.63	1.37	1.18

Notes:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.

"J-" = Indicates the result is estimated and may be biased low.

Table 3: Analytical Data
CCR Unit R. M. Schahfer Landfill Ph
NIPSCO LLC R. M. Schahfer Schahf
Wheatfield, Indiana

	Location	GAMW41		GAMW41B	
	Sample Date	2021-04-14	2021-09-13	2021-04-13	2021-09-13
	Sample Type	N	N	N	N
Chemical Name	Unit				
CCR Appendix III					
Boron	mg/L	10	9.4	26.2	28.8
Calcium	mg/L	123	134	223	231
Chloride	mg/L	119	44.4	571	687
Fluoride	mg/L	0.2	0.33	0.79	0.05 U
pH	SU	8.08	7.48	8.05	7.94
Sulfate	mg/L	2220	1750	6320	6250
Total Dissolved Solids	mg/L	3250	2750	10500	10800
Field Parameters					
Dissolved Oxygen	mg/L	0.14	0.21	0.42	0.19
Oxidation-Reduction Potential	millivolts	-137.2	-247	-187.2	-291.7
pH	SU	8.08	7.48	8.05	7.94
Specific Conductance	uS/cm	4802	9312	13008	11430
Temperature	deg c	10.15	19.2	13	15.88
Turbidity	ntu	4.43	1.91	3.81	1.8

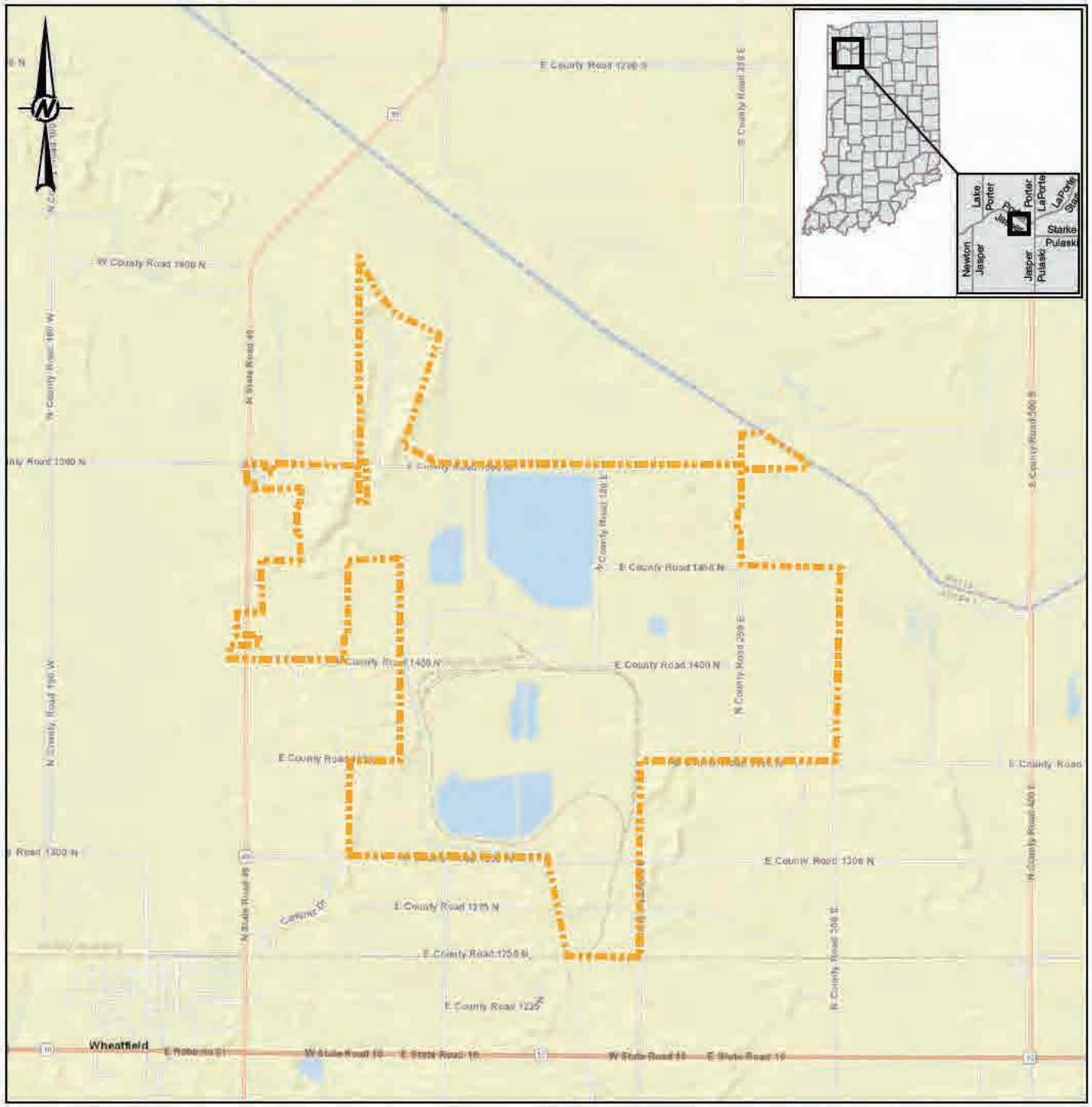
Notes:
mg/L = milligrams per liter
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units

"U" = Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.

"J-" = Indicates the result is estimated and may be biased low.

Prepared by: SLG
Checked by: DFSC
Reviewed by: JSP

FIGURES



LEGEND

Approximate Property Line

0 0.75 1.5

1 " = 0.75 miles Miles

REFERENCE(S)

SERVICE LAYER CREDITS: SOURCES: ESRI, HERE, GARMIN, USGS, NTERMAP, INCREMENT P, NRCAN, ESRI JAPAN, METI, ESRI CH NA (HONG KONG), ESRI KOREA, ESRI (THAILAND), NGCC, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

SITE LOCATION MAP

CONSULTANT

GOLDER
MEMBER OF WSP

YYYY-MM-DD	1/04/2021
DESIGNED	DFS
PREPARED	SHL
REVIEWED	JSP
APPROVED	MAH

PROJECT NO.	CONTROL	REV.	FIGURE
19121567	A	0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI A



LEGEND

- Background Monitoring Well
- Downgradient Monitoring Well
- Generalized Groundwater Flow Direction
- CCR Units
- Approximate Property Line

0 400 800

1" = 400 feet

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

WELL LOCATION MAP
SCHAHFER LANDFILL PHASES V, VI, AND VII

GOLDER
MEMBER OF WSP

DESIGNED DFS
APPROVED MW

PROJECT NO. 19491567 | CONTROL A | REV. 0 | 2

APPENDIX A

RMSGS Landfill Phases V, VI, and VII Alternative Source Demonstration March 2021

Northern Indiana Public Service Company LLC
(NIPSCO LLC)

R. M. Schahfer Generating Station

Wheatfield, Indiana

Schahfer Landfill Phase V, Phase VI, and Phase VII

Certification of Alternative Source Demonstration

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of restricted waste landfills and groundwater monitoring systems for them, do hereby state that I am qualified in the subject matter of CCR management, groundwater monitoring, data interpretation, and groundwater impacts. I have personally examined and am familiar with this alternative source demonstration (ASD) for the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder, and dated March 2021. Based on an inquiry of those individuals immediately responsible, and on supporting data which I understand to be true, accurate and complete, I verify the information in this ASD is accurate and meets the applicable requirements of the CCR Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as Phase V, Phase VI, and Phase VII has been prepared and meets the applicable requirements of 40 CFR §257.94(e)(2).

Daniel Sullivan

Daniel Sullivan
Indiana Professional Engineer
License # 19600309



3-31-2021

Date

TECHNICAL MEMORANDUM

DATE March 31, 2021 **Project No.** 19121567

TO Dan Sullivan, Jeff Loewe NIPSCO LLC

CC Maggie Rice, Maureen Turman, Craig Myers, Joe Kutch, Mark Haney, Jim Peace, Danielle Sylvia Cofelice

FROM Krysta Cione **EMAIL kcione@golder.com**

RE: R.M. SCHAHFER LANDFILL PHASES V, VI, AND VII ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO LLC), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the seventh (September 2020) groundwater Detection Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Landfill Phase V, Phase VI, and Phase VII (CCR Unit) in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, “Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule” (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

Statistical analyses of Appendix III groundwater Detection Monitoring results indicated statistically significant increases (SSIs) for seven analytes detected in groundwater samples collected from downgradient wells compared to background levels. Although determination of an SSI generally indicates that the groundwater monitoring program should transition from Detection Monitoring to Assessment Monitoring, 40 CFR §257.94(e)(2) allows the owner or operator (i.e., NIPSCO LLC) to demonstrate that a source other than the CCR unit or another condition caused the apparent SSI(s). Golder identified similar SSIs after the first (October 2017) Detection Monitoring event at the RMSGS Landfill Phase V and Phase VI and submitted an Alternative Source Demonstration (ASD) on April 13, 2018. As described in that ASD, the conceptual site model, historical groundwater data, and Phase V and Phase VI landfill design indicate the source of the identified SSIs is the unlined portion of the landfill, Phases I and II, which is not regulated by the CCR Rule. Golder recertified the ASD based on the second (February/March 2018) Detection Monitoring Event, on August 28, 2018; the third (September 2018) Detection Monitoring Event, on March 21, 2019; the fourth (March 2019) Detection Monitoring Event, on September 6, 2019; the fifth (October 2019) Detection Monitoring Event, on May 7, 2020; and the sixth (March 2020) Detection Monitoring Event, on September 29, 2020.

NIPSCO constructed a new landfill cell (Phase VII) immediately north of Phase VI in 2018. Due to the proximity of Phase VII to Phase VI and landfill construction activities, Golder decommissioned monitoring wells GAMW-21/21B, GAMW-22/22B, GAMW-23/23B, and GAMW-28/28B, which were part of the original CCR Rule-required landfill monitoring network. Golder collected groundwater samples from these original four well pairs from July 2016 to March 2018. To replace the decommissioned wells, Golder installed monitoring wells GAMW-38/38B, GAMW-39/39B, GAMW-40/40B, and GAMW-41/41B downgradient and along the waste boundary of Phase VII in April and May 2018.

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Golder collected groundwater samples from existing and replacement monitoring wells during the September 2020 semi-annual monitoring event. Groundwater analytical data obtained from groundwater samples collected from the downgradient wells in these subsequent events were consistent with historical analytical results. As discussed in the ASD recertification dated September 6, 2019, Golder calculated new prediction limits in June 2019 using all background data collected through March 2019. The table below provides the original prediction limits calculated in January 2018 and the revised prediction limits calculated in June 2019. Golder will re-evaluate the background dataset following collection of an additional four rounds of groundwater data from the background wells.

1.0 SUMMARY OF RESULTS

The results of the seventh Detection Monitoring event are included in the 2020 Annual Report and the results of the statistical analysis are summarized below. SSIs were detected in groundwater samples collected from monitoring wells downgradient of the RMSGS Landfill Phase V, Phase VI, and Phase VI, for all Appendix III parameters. Overall, results are consistent with those collected previously and indicate few differences from the SSIs detected during the previous Detection Monitoring events. The differences are likely due to normal or temporal fluctuations in groundwater quality. The SSI results are summarized in the table below by well location and timeframe of the SSI exceedance.

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
GAMW21*							
GAMW21B*	1,2	1,2	1		1,2		1,2
GAMW22*		2					
GAMW22B*	1,2	1,2	1,2		1,2		1,2
GAMW23*	1,2	1,2			1,2	1,2	1,2
GAMW23B*	1,2	1,2	1,2		1,2	1,2	1,2
GAMW26				1,3,5,6,7			2
GAMW26B		1,3,7	3,7		1,3,7	3	1,3,7
GAMW27	1,2,3,4,5,6,7	1,2,3,4,5,6,7			1,2,3,4,6,7		1,2,3,4,6,7
GAMW27B	1,2,3,4,5,6,7	1,2,3,5,6,7	1,2,3,4,5,6,7		1,2,3,4,5,6,7	3	1,2,3,4,5,6,7
GAMW28*	1,2	1,2	1		1,2		1,2

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
GAMW28B*	1,2	1,2	1,2		1,2		1,2
GAMW38							
GAMW38B	3,4,5,6,7	3,4,5,6,7	3,4		3,4,5,6,7		3,4,5,6,7
GAMW39	3	3,4,5,6,7			3	5	3
GAMW39B	3,4,5,6,7	3,4,5,6,7	3,4,5,6,7		3,4,5,6,7	5	3,4,5,6,7
GAMW40	3,4,6	3,4,5,6,7			3		3,4,5,6,7
GAMW40B	3,4,5,6,7	3,4,5,6,7	3,4,5,6,7		3,4,5,6,7	3,4,6	3,4,5,6,7
GAMW41	4,5,6,7	4,5,6,7	4,5,6,7		4,5,6,7		4,5,6,7
GAMW41B	4,5,6,7	4,6,7	4,5,6,7		4,5,6,7	6,7	4,5,6,7

"1" Indicates a statistically significant increase detected in the first Detection Monitoring event
"2" Indicates a statistically significant increase detected in the second Detection Monitoring event
"3" Indicates a statistically significant increase detected in the third Detection Monitoring event
"4" Indicates a statistically significant increase detected in the fourth Detection Monitoring event
"5" Indicates a statistically significant increase detected in the fifth Detection Monitoring event
"6" Indicates a statistically significant increase detected in the sixth Detection Monitoring event
"7" Indicates a statistically significant increase detected in the seventh Detection Monitoring event
"*" Indicates monitoring well was decommissioned prior to the third Detection Monitoring event

2.0 ALTERNATIVE SOURCE DEMONSTRATION CONCLUSION

The preceding information indicates the results of the seventh Detection Monitoring event are consistent with the previous Detection Monitoring events, and the rationale behind the ASD dated April 13, 2018 is still applicable. Golder prepared the ASD in accordance with 40 CFR 257.94(e)(2) and it supports the finding that the SSIs determined on December 18, 2020 are not due to a release from the CCR Unit. As described in that 2018 ASD, the conceptual site model, historical groundwater data, and the Phase V, Phase VI, and Phase VII landfill design indicate that a release from the unlined portion of the landfill not subject to the CCR Rule, Phases I and II, is the source of the identified SSIs. Therefore, no further action (i.e., Assessment Monitoring) is warranted, and the Schahfer Landfill Phases V, VI, and VII will remain in Detection Monitoring.

3.0 REFERENCES

Golder Associates, "Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration", April 13, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, August 28, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, March 31, 2019.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 6, 2019.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, May 7, 2020.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 29, 2020.

https://golderassociates.sharepoint com/sites/nipscoccrgwmonitoring/shared documents/rmsgs/reports/landfill asd recertifications/2021-march/draft/draft landfill asd recertification.docx

APPENDIX B

RMSGS Landfill Phases V, VI, and VII Alternative Source Demonstration October 2021

Northern Indiana Public Service Company LLC
(NIPSCO LLC)

R. M. Schahfer Generating Station

Wheatfield, Indiana

Schahfer Landfill Phase V, Phase VI, and Phase VII

Certification of Alternative Source Demonstration

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of restricted waste landfills and groundwater monitoring systems for them, do hereby state that I am qualified in the subject matter of CCR management, groundwater monitoring, data interpretation, and groundwater impacts. I have personally examined and am familiar with this alternative source demonstration (ASD) for the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder, and dated October 2021. Based on an inquiry of those individuals immediately responsible, and on supporting data which I understand to be true, accurate and complete, I verify the information in this ASD is accurate and meets the applicable requirements of the CCR Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as Phase V, Phase VI, and Phase VII has been prepared and meets the applicable requirements of 40 CFR §257.94(e)(2).

Daniel Sullivan

Daniel Sullivan
Indiana Professional Engineer
License # 19600309

10.26.2021

Date



TECHNICAL MEMORANDUM

DATE October 26, 2021 **Project No.** 19121567

TO Dan Sullivan, Jeff Loewe NIPSCO LLC

CC Maggie Rice, Maureen Turman, Joe Kutch, Mark Haney, Jim Peace

FROM Danielle Sylvia Cofelice **EMAIL dsylvia@golder.com**

RE: R.M. SCHAHFER LANDFILL PHASES V, VI, AND VII ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the eighth (April 2021) groundwater Detection Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Landfill Phase V, Phase VI, and Phase VII (CCR Unit) in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule" (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

Statistical analyses of Appendix III groundwater Detection Monitoring results indicated statistically significant increases (SSIs) for seven analytes detected in groundwater samples collected from downgradient wells compared to background levels. Although determination of an SSI generally indicates that the groundwater monitoring program should transition from Detection Monitoring to Assessment Monitoring, 40 CFR §257.94(e)(2) allows the owner or operator (i.e., NIPSCO LLC) to demonstrate that a source other than the CCR unit or another condition caused the apparent SSI(s). Golder identified similar SSIs after the first (October 2017) Detection Monitoring event at the RMSGS Landfill Phase V and Phase VI and submitted an Alternative Source Demonstration (ASD) on April 13, 2018. As described in that ASD, the conceptual site model, historical groundwater data, and Phase V and Phase VI landfill design indicate the source of the identified SSIs is the unlined portion of the landfill, Phases I and II, which is not regulated by the CCR Rule. Golder recertified the ASD based on the second (February/March 2018) Detection Monitoring Event, on August 28, 2018; the third (September 2018) Detection Monitoring Event, on March 21, 2019; the fourth (March 2019) Detection Monitoring Event, on September 6, 2019; the fifth (October 2019) Detection Monitoring Event, on May 7, 2020; the sixth (March 2020) Detection Monitoring Event, on September 29, 2020, and the seventh (October 2020) Detection Monitoring Event, on March 31, 2021.

NIPSCO constructed a new landfill cell (Phase VII) immediately north of Phase VI in 2018. Phase VII is constructed in a similar manner to Phase V and Phase VI. Due to the proximity of Phase VII to Phase VI and landfill construction activities, Golder decommissioned monitoring wells GAMW-21/21B, GAMW-22/22B, GAMW-23/23B, and GAMW-28/28B, which were part of the original CCR Rule-required landfill monitoring network. Golder collected groundwater samples from these original four well pairs from July 2016 to March 2018. To replace the decommissioned wells, Golder installed monitoring wells GAMW-38/38B, GAMW-39/39B, GAMW-40/40B, and GAMW-41/41B downgradient and along the waste boundary of Phase VII in April and May 2018.

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Golder collected groundwater samples from existing and replacement monitoring wells during the September 2020 semi-annual monitoring event. Groundwater analytical data obtained from groundwater samples collected from the downgradient wells in these subsequent events were consistent with historical analytical results.

As discussed in the ASD recertification dated September 6, 2019, Golder calculated new prediction limits in June 2019 using all background data collected through March 2019. Again, in July 2021, Golder reviewed the analytical data collected to date and considered the option to update the prediction limits. The Groundwater Monitoring Program Implementation Manual (GMPIM, 2017) and the Unified Guidance allow for updating the statistical limits after a minimum of four "new measurements" are available. The periodic update of background datasets improves statistical power and accuracy by providing a more complete approximation of the true background population. The analytical data collected, and groundwater flow directions observed to date, indicate the chosen background wells are still representative of background conditions. The table below provides the original prediction limits calculated in January 2018, the revised prediction limits calculated in June 2019, and the revised prediction limits calculated in July 2021. Golder will re-evaluate the background dataset following collection of an additional four rounds of groundwater data from the background wells.

1.0 SUMMARY OF RESULTS

The results of the eighth Detection Monitoring event will be included in the 2021 Annual Report and the results of the statistical analysis are summarized below. SSIs were detected in groundwater samples collected from monitoring wells downgradient of the RMSGS Landfill Phase V, Phase VI, and Phase VI, for all Appendix III parameters. Overall, results are consistent with those collected previously and indicate few differences from the SSIs detected during the previous Detection Monitoring events. The differences are likely due to normal or temporal fluctuations in groundwater quality. The SSI results are summarized in the table below by well location and timeframe of the SSI exceedance.

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
Prediction Level (2021)	**3.8**	**230**	**50.21**	**2.3**	**670**	**6.184-8.163**	**1210**
GAMW21*							
GAMW21B*	1,2	1,2	1		1,2		1,2
GAMW22*		2					
GAMW22B*	1,2	1,2	1,2		1,2		1,2
GAMW23*	1,2	1,2			1,2	1,2	1,2
GAMW23B*	1,2	1,2	1,2		1,2	1,2	1,2
GAMW26				1,3,5,6,7, 8			2

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
Prediction Level (2021)	**3.8**	**230**	**50.21**	**2.3**	**670**	**6.184-8.163**	**1210**
GAMW26B		1,3,7	3,7		1,3,7	3	1,3,7
GAMW27	1,2,3,4,5,6,7,8	1,2,3,4,5,6,7,8			1,2,3,4,6,7,8		1,2,3,4,6,7,8
GAMW27B	1,2,3,4,5,6,7,8	1,2,3,5,6,7,8	1,2,3,4,5,6,7,8		1,2,3,4,5,6,7,8	3	1,2,3,4,5,6,7,8
GAMW28*	1,2	1,2	1		1,2		1,2
GAMW28B*	1,2	1,2	1,2		1,2		1,2
GAMW38							
GAMW38B	3,4,5,6,7,8	3,4,5,6,7,8	3,4		3,4,5,6,7,8		3,4,5,6,7,8
GAMW39	3	3,4,5,6,7			3	5	3
GAMW39B	3,4,5,6,7,8	3,4,5,6,7,8	3,4,5,6,7,8		3,4,5,6,7,8	5	3,4,5,6,7,8
GAMW40	3,4,6	3,4,5,6,7,8			3		3,4,5,6,7,8
GAMW40B	3,4,5,6,7,8	3,4,5,6,7	3,4,5,6,7,8		3,4,5,6,7,8	3,4,6,8	3,4,5,6,7,8
GAMW41	4,5,6,7,8	4,5,6,7	4,5,6,7,8		4,5,6,7,8		4,5,6,7,8
GAMW41B	4,5,6,7,8	4,6,7	4,5,6,7,8		4,5,6,7,8	6,7	4,5,6,7,8

"1" Indicates a statistically significant increase detected in the first Detection Monitoring event
"2" Indicates a statistically significant increase detected in the second Detection Monitoring event
"3" Indicates a statistically significant increase detected in the third Detection Monitoring event
"4" Indicates a statistically significant increase detected in the fourth Detection Monitoring event
"5" Indicates a statistically significant increase detected in the fifth Detection Monitoring event
"6" Indicates a statistically significant increase detected in the sixth Detection Monitoring event
"7" Indicates a statistically significant increase detected in the seventh Detection Monitoring event
"8" Indicates a statistically significant increase detected in the eighth Detection Monitoring event
"*" Indicates monitoring well was decommissioned prior to the third Detection Monitoring event

2.0 ALTERNATIVE SOURCE DEMONSTRATION CONCLUSION

The preceding information indicates the results of the eighth Detection Monitoring event are consistent with the previous Detection Monitoring events, and the rationale behind the ASD dated April 13, 2018 is still applicable. Golder prepared the ASD in accordance with 40 CFR 257.94(e)(2) and it supports the finding that the SSIs determined on July 28, 2021 are not due to a release from the CCR Unit. As described in that 2018 ASD, the conceptual site model, historical groundwater data, and the Phase V, Phase VI, and Phase VII landfill design indicate that a release from the unlined portion of the landfill not subject to the CCR Rule, Phases I and II, is the source of the identified SSIs. Therefore, no further action (i.e., Assessment Monitoring) is warranted, and the Schahfer Landfill Phases V, VI, and VII will remain in Detection Monitoring.

3.0 REFERENCES

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, April 13, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, August 28, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, March 31, 2019.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 6, 2019.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, May 7, 2020.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 29, 2020.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, March 31, 2021.

https://golderassociates.sharepoint com/sites/nipscoccrgwmonitoring/shared documents/rmsgs/reports/landfill asd recertifications/2021-october/draft/draft landfill asd recertification docx



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APPENDIX G

Waste Disposal Area Alternative Source Demonstration- December 2020

Northern Indiana Public Service Company LLC (NIPSCO LLC)

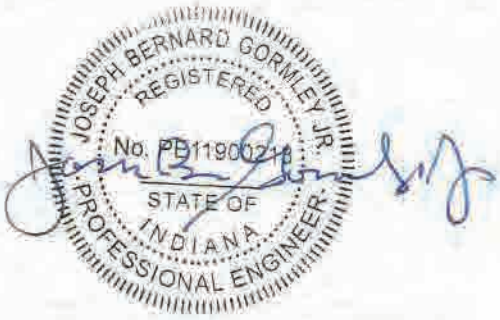
R. M. Schahfer Generating Station – Waste Disposal Area

Wheatfield, Indiana

Recertification of Alternative Source Demonstration

40 CFR §257.95

I have personally reviewed this recertification of the alternative source demonstration (ASD), the subject of which is the Waste Disposal Area (WDA) at the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder Associates Inc. and dated December 2020. Based on an inquiry of those individuals immediately responsible and on supporting data that I understand to be true, accurate, and complete, I verify the information in this recertification of the ASD is accurate and meets the applicable requirements of the CCR Final Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as the WDA meets the applicable requirements of 40 CFR §257.95.



Joseph Bernard Gormley, Jr.
Indiana Professional Engineer
License #: PE11900213

12/4/2020
Date

TECHNICAL MEMORANDUM

DATE December 4, 2020 **Project No.** 19121567

TO Marc Okin, Dan Sullivan, NIPSCO LLC

CC Maggie Rice, Maureen Turman, Joe Kutch, Mark Haney, Jim Peace, Joe Gormley

FROM Danielle Sylvia Cofelice **EMAIL dsylvia@golder.com**

RE: RECERTIFICATION OF R.M. SCHAHFER WASTE DISPOSAL AREA ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO LLC), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the fifth (April 2020) groundwater Assessment Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Waste Disposal Area (CCR Unit). This evaluation was conducted in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule" (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

The statistical evaluation of the fifth Assessment Monitoring event was completed on September 7, 2020. The results of the statistical evaluation indicated the lower confidence level (LCL) exceeded the background concentration for lithium and molybdenum in assessment monitoring well GAMW51B, which is interpreted as apparent evidence of a statistically-significant level (SSL). Although determination of an SSL generally indicates that the groundwater monitoring program should transition from Assessment Monitoring to Assessment of Corrective Measures, 40 CFR §257.95(g)(3) allows the owner or operator (i.e., NIPSCO LLC) to demonstrate that a source other than the CCR unit or another condition caused the apparent SSL. Golder identified similar concentrations of lithium and molybdenum in groundwater samples collected from GAMW51B after the fourth (October 2019) Assessment Monitoring event at the RMSGS Waste Disposal Area (WDA) and submitted an Alternative Source Demonstration (ASD) on June 9, 2020. As described in the ASD, the source material characteristics and site hydrogeology indicate that the source of the lithium and molybdenum SSLs observed in GAMW51B is not due to a release from the WDA.

1.0 SUMMARY OF RESULTS

The lithium and molybdenum sample results collected from GAMW51B in April 2020 were 0.076 milligram per liter (mg/L) and 0.18 mg/L, respectively. These results are less than two times the GWPS of 0.04 mg/L and 0.1 mg/L for lithium and molybdenum, respectively, which are equal to the risk-based levels included in the CCR Rule, Part 1 Phase 1 Addendum. The most recent molybdenum result is within the range of the previous data, however, the lithium result is slightly above the previous maximum (0.064 mg/L). Overall, the data is consistent with the previous Assessment Monitoring event.

2.0 ALTERNATIVE SOURCE DEMONSTRATION

The information presented above indicates the results of the fifth Assessment Monitoring event are consistent with the previous Assessment Monitoring event, and the rationale presented in the June 9, 2020 ASD is still

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applicable. Golder prepared the current ASD in accordance with 40 CFR 257.95(g)(3) and it supports the finding that the SSLs determined in the September 7, 2020 statistical evaluation are not due to release from the CCR Unit. As described above and in the June 9, 2020 ASD, the source material characteristics and site hydrogeology indicate that the source of the lithium and molybdenum SSLs observed in GAMW51B are due to a different condition and not due to a release from the WDA. Therefore, no further action (i.e., Assessment of Corrective Measures) is warranted, and the WDA will remain in Assessment Monitoring.

3.0 REFERENCES

Golder Associates, “Alternative Source Demonstration- Waste Disposal Area”, June 9, 2020.

APPENDIX H

Waste Disposal Area Alternative Source Demonstration- May 2021

TECHNICAL MEMORANDUM

DATE May 18, 2021 **Project No.** 19121567

TO Jeff Loewe, Dan Sullivan, NIPSCO LLC

CC Maggie Rice, Maureen Turman, Joe Kutch, Mark Haney, Jim Peace, Joe Gormley

FROM Danielle Sylvia Cofelice **EMAIL dsylvia@golder.com**

RE: RECERTIFICATION OF R.M. SCHAHFER WASTE DISPOSAL AREA ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO LLC), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the sixth (October 2020) groundwater Assessment Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Waste Disposal Area (WDA, CCR Unit). This evaluation was conducted in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule" (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

The statistical evaluation of analytical data from the sixth Assessment Monitoring event was completed on February 17, 2021. The results of the statistical evaluation indicated the lower confidence level (LCL) exceeded the background concentrations for lithium and molybdenum in assessment monitoring well GAMW51B and the background concentration for molybdenum in assessment monitoring well GAMW60B, which are interpreted as apparent evidence of a statistically-significant levels (SSLs). Although determination of an SSL generally indicates that the groundwater monitoring program should transition from Assessment Monitoring to Assessment of Corrective Measures, 40 CFR §257.95(g)(3) allows the owner or operator (i.e., NIPSCO LLC) to demonstrate that a source other than the CCR Unit or another condition caused the apparent SSL.

Golder identified similar concentrations of lithium and molybdenum in groundwater samples collected from GAMW51B after the fourth (October 2019) Assessment Monitoring event at the WDA and submitted an Alternative Source Demonstration (ASD) on June 9, 2020 (Golder 2020). As described in the ASD, the source material characteristics and site hydrogeology indicated that the source of the lithium and molybdenum SSLs observed in GAMW51B was not due to a release from the WDA. Golder recertified this ASD after the fifth Assessment Monitoring event (April 2020), which confirmed the molybdenum and lithium results observed in GAMW-51B.

1.0 SUMMARY OF OCTOBER 2020 RESULTS

The lithium and molybdenum concentrations in samples collected from GAMW51B in October 2020 were 0.063 milligrams per liter (mg/L) and 0.17 mg/L, respectively. These results are less than two times the Groundwater Protection Standards (GWPS) of 0.04 mg/L and 0.1 mg/L for lithium and molybdenum, respectively, which are equal to the risk-based levels included in the CCR Rule, Part 1 Phase 1 Addendum. The molybdenum concentrations in the samples collected to date from GAMW60B range from 0.38 mg/L to 0.49 mg/L (approximately four times the GWPS of 0.1 mg/L). The October 2020 Assessment Monitoring event was the fourth

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round of sampling at this location. The most recent molybdenum and lithium results collected at both locations are within the range of the previous data. Overall, the data are consistent with the previous Assessment Monitoring event.

2.0 ALTERNATIVE SOURCE DEMONSTRATION

As described in the June 2020 ASD, Assessment Monitoring well GAMW60B was installed downgradient of GAMW51/51B in 2019 to further assess the nature and extent and overall groundwater quality farther downgradient of the WDA. Monitoring wells GAMW14, GAMW14B, GAMW51, and GAMW51B are all located between the WDA and Assessment Monitoring well GAMW60B (see Figure 1). The WDA has generally received and managed the same waste streams and been operated in a consistent manner since its opening more than 35 years ago. Given the lengthy time horizon of operations and geochemical fingerprints of the source materials within the CCR Unit, if the WDA was the source of molybdenum in groundwater at GAMW60B, it would be expected that upgradient wells would have similar or higher concentrations of molybdenum, which they do not.

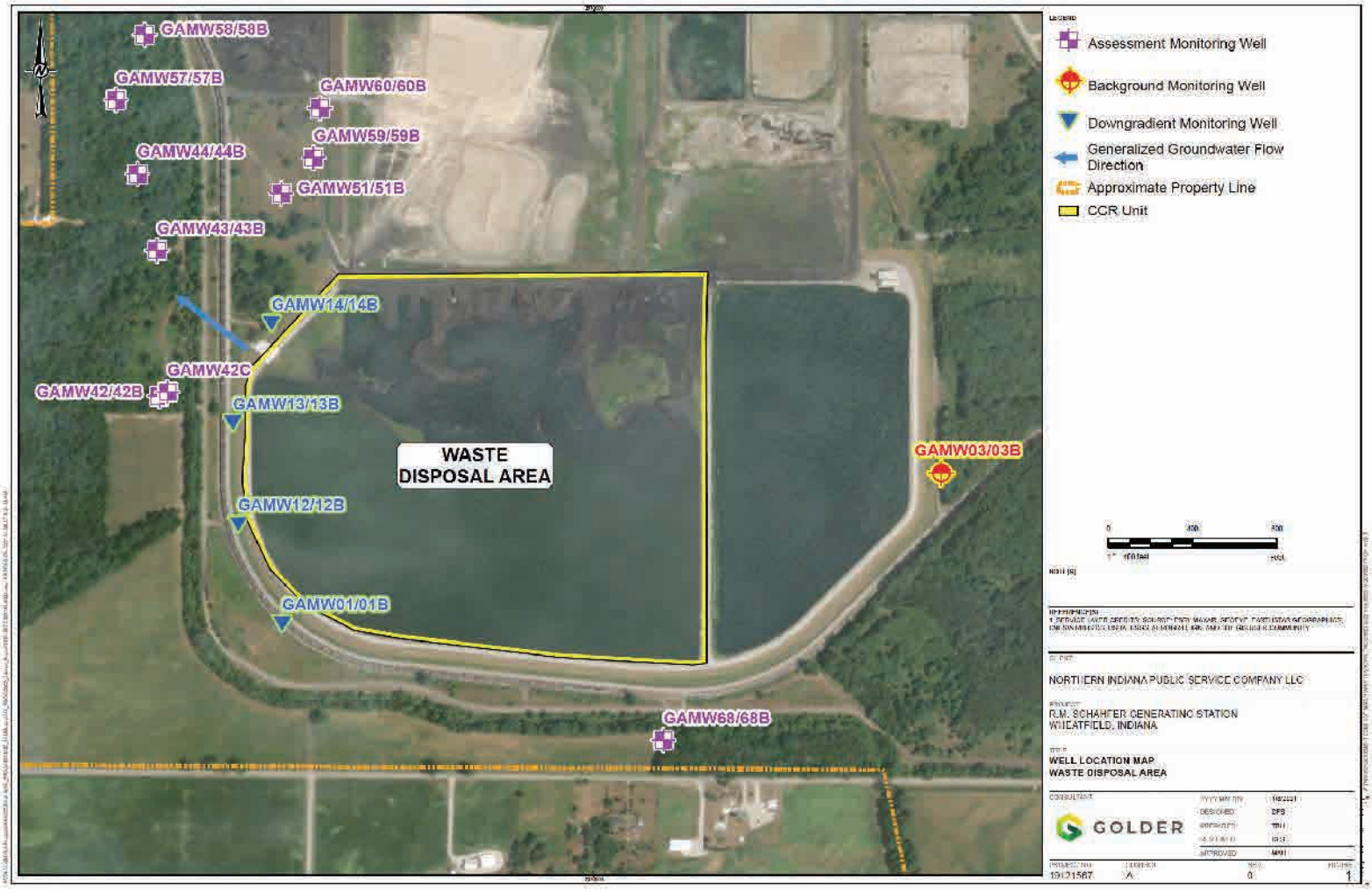
The 2020 WDA ASD discusses three primary lines of evidence: 1) the low concentrations of molybdenum in the WDA source materials and porewater, 2) the relative major ion abundance in groundwater that demonstrates a distinct difference between WDA porewater and downgradient groundwater samples, with no indications of mixing, and 3) the waste management boundary monitoring wells GAMW14 and GAMW14B, which are located upgradient of monitoring wells GAMW51B and GAMW60B, do not indicate molybdenum above the GWPS, . Considered individually and together, these lines of evidence indicate the CCR Unit is not the source of the molybdenum in the groundwater monitored by GAMW51B and GAMW60B.

The information presented above confirms the results of the sixth Assessment Monitoring event are consistent with the previous Assessment Monitoring event, and the rationale presented in the June 9, 2020 ASD is still applicable. Golder prepared the current ASD in accordance with 40 CFR 257.95(g)(3) and it supports the finding that the SSLs determined in the February 17, 2021 statistical evaluation are not due to release from the CCR Unit. As described above and in the June 9, 2020 ASD, the source material characteristics and site hydrogeology indicate that the source of the lithium and molybdenum SSLs observed in GAMW51B and the molybdenum SSL in GAMW60B are due to a different condition and not due to a release from the WDA. Therefore, no further action (i.e., Assessment of Corrective Measures) is warranted, and the WDA will remain in Assessment Monitoring.

3.0 REFERENCES

Golder 2020. Alternative Source Demonstration - Waste Disposal Area, Golder Associates Inc., June 9, 2020.

https://golderassociates.sharepoint com/sites/nipscoccrgwmonitoring/shared documents/rmsgs/reports/wda asd spring 2021/wda recertification 2021-05 docx


GAMW58/58B
GAMW57/57B
GAMW60/60B
GAMW59/59B
GAMW44/44B
GAMW51/51B
GAMW43/43B
GAMW14/14B
GAMW42C
GAMW42/42B
GAMW13/13B
WASTE DISPOSAL AREA
GAMW03/03B
GAMW12/12B
GAMW01/01B
GAMW68/68B
Assessment Monitoring Well
Background Monitoring Well
Downgradient Monitoring Well
Generalized Groundwater Flow Direction
Approximate Property Line
CCR Unit
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA
WELL LOCATION MAP
WASTE DISPOSAL AREA
GOLDER
DESIGNED
DPS
APPROVED
MW
19121587
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APPENDIX I

Waste Disposal Area Alternative Source Demonstration - November 2021

Northern Indiana Public Service Company LLC (NIPSCO LLC)

R. M. Schahfer Generating Station – Waste Disposal Area

Wheatfield, Indiana

Recertification of Alternative Source Demonstration

40 CFR §257.95

I have personally reviewed this recertification of the alternative source demonstration (ASD), the subject of which is the Waste Disposal Area (WDA) at the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder Associates Inc. and dated November 2021. Based on an inquiry of those individuals immediately responsible and on supporting data that I understand to be true, accurate, and complete, I verify the information in this recertification of the ASD is accurate and meets the applicable requirements of the CCR Final Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as the WDA meets the applicable requirements of 40 CFR §257.95.



Joseph Bernard Gormley, Jr.
Indiana Professional Engineer
License #: PE11900213

11/12/2021
Date

GOLDER

TECHNICAL MEMORANDUM

DATE November12, 2021 **Project No.** 19121567

TO Jeff Loewe, Dan Sullivan, NIPSCO LLC

CC Maggie Rice, Maureen Turman, Joe Kutch, Mark Haney, Jim Peace, Joe Gormley

FROM Danielle Sylvia Cofelice **EMAIL dsylvia@golder.com**

RE: RECERTIFICATION OF R.M. SCHAHFER WASTE DISPOSAL AREA ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the seventh (April 2021) groundwater Assessment Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Waste Disposal Area (WDA, CCR Unit). This evaluation was conducted in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule" (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

The statistical evaluation of analytical data from the seventh Assessment Monitoring event was completed on August 19, 2021. The results of the statistical evaluation indicated the lower confidence level (LCL) concentrations for lithium and molybdenum in assessment monitoring well GAMW51B and molybdenum in assessment monitoring well GAMW60B exceeded background concentrations, which are interpreted as apparent evidence of statistically-significant levels (SSLs) in those wells. Although determination of apparent SSLs generally indicates that the groundwater monitoring program should transition from Assessment Monitoring to Assessment of Corrective Measures, 40 CFR §257.95(g)(3) allows the owner or operator (e.g., NIPSCO) to demonstrate that a source other than the CCR Unit or another condition caused the apparent SSLs.

Golder identified similar concentrations of lithium and molybdenum in GAMW51B after the fourth (October 2019) Assessment Monitoring event at the WDA and submitted an Alternative Source Demonstration (ASD) on June 9, 2020 (Golder 2020). As described in the ASD, the source material characteristics and site hydrogeology indicated that the apparent lithium and molybdenum SSLs observed in GAMW51B were not due to a release from the WDA. Golder recertified this ASD after the fifth Assessment Monitoring event (April 2020) and sixth Assessment Monitoring event (October 2020), which confirmed the molybdenum and lithium results observed previously in GAMW51B.

1.0 SUMMARY OF APRIL 2021 RESULTS

The lithium and molybdenum concentrations in samples collected from GAMW51B in April 2021 were 0.071 milligrams per liter (mg/L) and 0.16 mg/L, respectively. These results are less than two times the Groundwater Protection Standards (GWPS) of 0.04 mg/L and 0.1 mg/L for lithium and molybdenum, respectively, which are equal to the risk-based levels included in the CCR Rule, Part 1 Phase 1 Addendum. The molybdenum concentrations in the samples collected to date from GAMW60B range from 0.35 mg/L to 0.49 mg/L (approximately four times the GWPS of 0.1 mg/L). The most recent molybdenum and lithium results collected at

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both locations are within the range of the previous concentrations and are consistent with the previous Assessment Monitoring event.

2.0 ALTERNATIVE SOURCE DEMONSTRATION

As described in the June 2020 ASD, Assessment Monitoring well GAMW60B was installed downgradient of wells GAMW51 and GAMW51B in 2019 to further assess the nature and extent and overall groundwater quality farther downgradient of the WDA. Monitoring wells GAMW14, GAMW14B, GAMW51, and GAMW51B are all located between the WDA and Assessment Monitoring well GAMW60B (see Figure 1). The WDA has generally received and managed the same waste streams and been operated in a consistent manner since its opening more than 35 years ago. Given the lengthy time horizon of operations and geochemical fingerprints of the source materials within the CCR Unit, if the WDA was the source of molybdenum in groundwater at GAMW60B, it would be expected that wells upgradient of GAMW60B would have similar or higher concentrations of molybdenum, which they do not.

The June 2020 WDA ASD discusses three primary lines of evidence: 1) the low concentrations of molybdenum in the WDA source materials and porewater, 2) the relative major ion abundance in groundwater that demonstrates a distinct difference between WDA porewater and downgradient groundwater samples, with no indications of mixing, and 3) the waste management boundary monitoring wells GAMW14 and GAMW14B, which are located upgradient of monitoring wells GAMW51B and GAMW60B, do not indicate molybdenum above the GWPS. Considered individually and together, these lines of evidence indicate the CCR Unit is not the source of the molybdenum in the groundwater monitored by GAMW51B and GAMW60B.

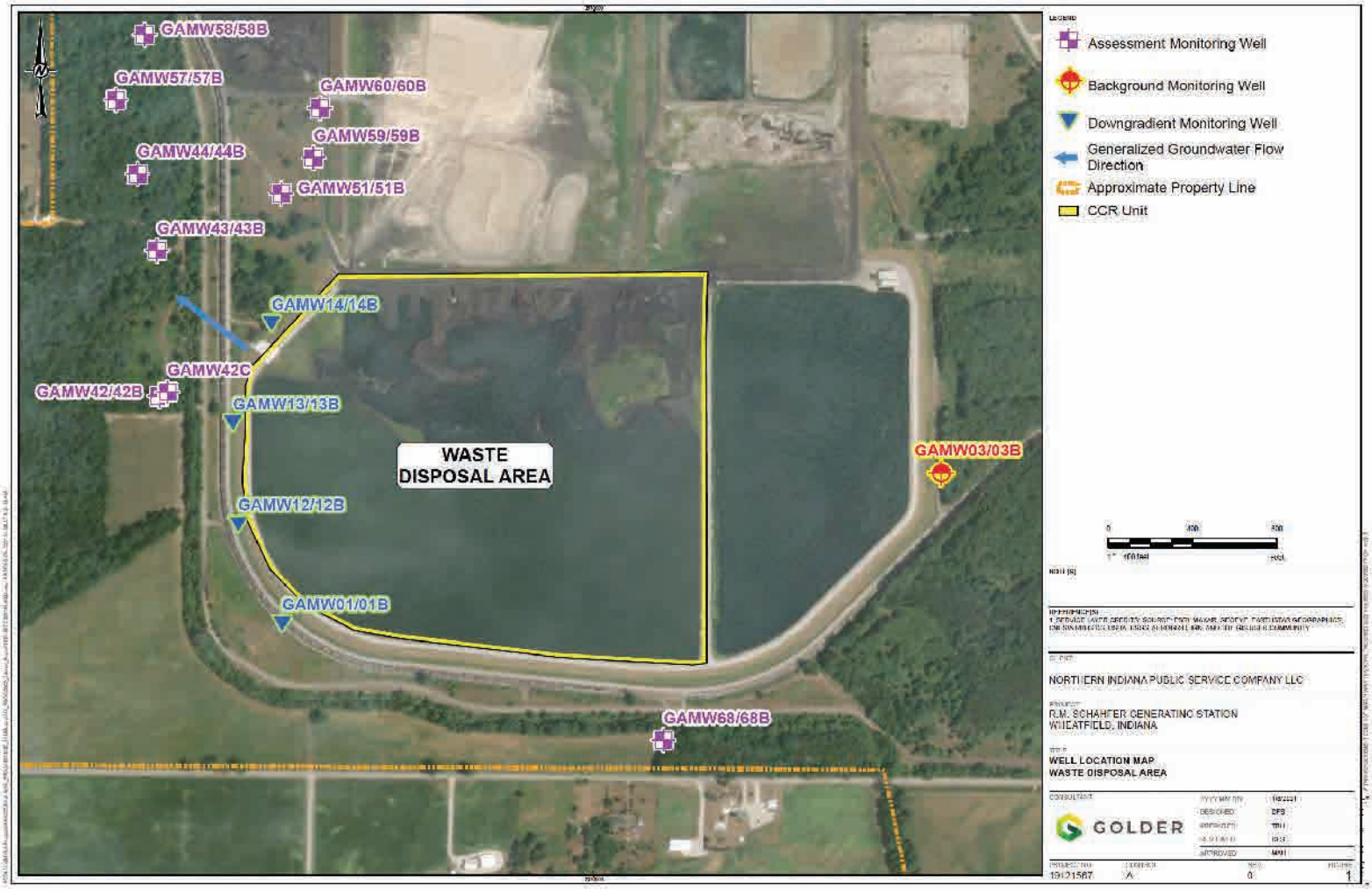
The information presented above confirms the results of the seventh Assessment Monitoring event are consistent with the previous Assessment Monitoring event, and the rationale presented in the June 9, 2020 ASD is still applicable. Golder prepared the current ASD in accordance with 40 CFR 257.95(g)(3) and it supports the finding that the SSLs determined in the August 19, 2021 statistical evaluation are not due to release from the CCR Unit. As described above and in the June 9, 2020 ASD, the source material characteristics and site hydrogeology indicate that the source of the apparent lithium and molybdenum SSLs observed in GAMW51B and the apparent molybdenum SSL in GAMW60B are due to a different condition and not due to a release from the WDA. Therefore, no further action (i.e., Assessment of Corrective Measures) is warranted, and the WDA will remain in Assessment Monitoring.

3.0 REFERENCES

Golder 2020. Alternative Source Demonstration – Waste Disposal Area, Golder Associates Inc., June 9, 2020.

Golder 2020. Recertification of R.M. Schahfer Waste Diposal Area Alternative Source Demonstration, Golder Associates Inc., December 4, 2020.

Golder 2021. Recertification of R.M. Schahfer Waste Disposal Area Alternative Source Demonstration, Golder Associates Inc., May 18, 2021.


GAMW58/58B
GAMW57/57B
GAMW60/60B
GAMW59/59B
GAMW44/44B
GAMW51/51B
GAMW43/43B
GAMW14/14B
GAMW42C
GAMW42/42B
GAMW13/13B
WASTE DISPOSAL AREA
GAMW03/03B
GAMW12/12B
GAMW01/01B
GAMW68/68B
Assessment Monitoring Well
Background Monitoring Well
Downgradient Monitoring Well
Generalized Groundwater Flow Direction
Approximate Property Line
CCR Unit
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA
WELL LOCATION MAP
WASTE DISPOSAL AREA
GOLDER
DESIGNED
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APPROVED
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APPENDIX J

Waste Disposal Area Alternative Source Demonstration- April 2022

Northern Indiana Public Service Company LLC (NIPSCO LLC)

R. M. Schahfer Generating Station – Waste Disposal Area

Wheatfield, Indiana

Recertification of Alternative Source Demonstration

40 CFR §257.95

I have personally reviewed this recertification of the alternative source demonstration (ASD), the subject of which is the Waste Disposal Area (WDA) at the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder Associates USA, Inc. and dated April 15, 2022. Based on an inquiry of those individuals immediately responsible and on supporting data that I understand to be true, accurate, and complete, I verify the information in this recertification of the ASD is accurate and meets the applicable requirements of the CCR Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as the WDA meets the applicable requirements of 40 CFR §257.95.



Joseph Bernard Gormley, Jr.
Indiana Professional Engineer
License #: PE11900213

4/15/2022
Date

TECHNICAL MEMORANDUM

DATE April 15, 2022 **Project No.** 19121567

TO Jeff Loewe, Dan Sullivan, NIPSCO LLC

CC Maggie Rice, Joe Kutch, Mark Haney, Jim Peace

FROM Danielle Sylvia Cofelice, Joseph B. Gormley, Jr., PE **EMAIL dsylvia@golder.com, jgormley@golder.com**

RE: RECERTIFICATION OF R.M. SCHAHFER WASTE DISPOSAL AREA ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO) and in accordance with 40 CFR §257.95(g)(3), Golder Associates USA Inc, *a member of WSP*. (Golder) has prepared this technical memorandum to confirm that the latest assessment monitoring results 1) are consistent with previous monitoring events, and 2) continue to support the findings of the June 9, 2020 Alternative Source Demonstration (ASD) for the Waste Disposal Area (WDA) Coal Combustion Residual Unit (CCR Unit) at the NIPSCO Rollin M. Schahfer Generating Station (RMSGS).

1.0 BACKGROUND

Following Detection Monitoring and the determination of statistically significant increases (SSIs) over background levels for one or more Appendix III constituents, NIPSCO established an Assessment Monitoring program in January 2018 to assess the nature and extent and overall groundwater quality farther downgradient of the WDA. The WDA and groundwater monitoring network are shown in Figure 1.

As part of the Assessment Monitoring program for the WDA, Golder collects groundwater samples from each background and downgradient monitoring well for analysis of Appendix III and IV constituents per 40 CFR §257.95. Following receipt and validation of laboratory results, Golder evaluates the results to determine the concentration of Appendix IV constituents in the wells relative to groundwater protection standards (GWPS). The GWPS for lithium (0.04 mg/L) and molybdenum (0.1 mg/L) are equal to the risk-based levels included in the CCR Rule, Part 1 Phase 1 Addendum. In addition, Golder's evaluations include statistical analysis of the results that are performed in accordance with40 CFR §257.95(h)(2).

Following the fourth Assessment Monitoring event in October/November 2019, Golder performed a statistical evaluation of analytical data in March 2020. The results of that statistical evaluation indicated an apparent statistically significant level (SSL) for molybdenum in well GAMW51B. While the results did not indicate an apparent SSL for lithium in well GAMW51B, they did show that three of the four samples collected from GAMW51B had detections of lithium above the GWPS. Although determination of apparent SSLs generally indicates that the groundwater monitoring program should transition from Assessment Monitoring to Assessment of Corrective Measures, 40 CFR §257.95(g)(3)(ii) allows the owner or operator (e.g., NIPSCO) to demonstrate that a source other than the CCR Unit or another condition caused the apparent SSLs. NIPSCO tasked Golder with further evaluating the data findings and, if appropriate, performing an ASD for the WDA.

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For the ASD, Golder presented a preliminary assessment of the Site history, geologic conditions, and data from porewater, CCR source materials, overburden, bedrock, and groundwater samples that indicated the potential for the SSL to be a result of another condition or a source other than the CCR Unit. Based on the preliminary assessment results, Golder performed additional evaluations to demonstrate that molybdenum and lithium concentrations in well GAMW51B were related to other sources and summarized those evaluations in the June 2020 ASD for the WDA.

As described in the June 2020 ASD, the WDA has generally received and managed the same waste streams and been operated in a consistent manner since its opening more than 35 years ago. Given the lengthy time horizon of operations and geochemical fingerprints of the source materials within the CCR Unit, if the WDA was the source of molybdenum in groundwater at GAMW51B, it would be expected that wells upgradient of GAMW51B would have similar or higher concentrations of molybdenum; however, they do not.

Furthermore, the June 2020 WDA ASD discussed the following three primary lines of evidence that demonstrated that the WDA is not the source of the molybdenum in the groundwater monitored by GAMW51B:

1) The low concentrations of molybdenum in the WDA source materials and porewater.

2) The relative major ion abundance in groundwater that demonstrates a distinct difference between WDA porewater and downgradient groundwater samples, with no indications of mixing.

3) The waste management boundary monitoring wells GAMW14 and GAMW14B, which are located upgradient of monitoring wells GAMW51B, do not indicate molybdenum above the GWPS.

Following the ASD and in accordance with 40 CFR §257.95(g)(3), Golder continued Assessment Monitoring of the WDA. Based on monitoring results from these subsequent monitoring events, Golder confirmed molybdenum and lithium concentrations were consistent with previous results for GAMW51B. As a result, Golder recertified the ASD after the fifth (April 2020), sixth (October 2020), and seventh (April 2021) Assessment Monitoring events.

2.0 SUMMARY OF SEPTEMBER 2021 ASSESSMENT MONITORING RESULTS

Golder performed the eighth Assessment Monitoring event for the WDA in September 2021. The monitoring results from that event showed lithium and molybdenum concentrations in the GAMW51B sample were 0.078 milligrams per liter (mg/L) and 0.15 mg/L, respectively. These results are 1.5 and 1.95 times greater than the GWPS of 0.04 mg/L and 0.1 mg/L for lithium and molybdenum, respectively. In addition, the monitoring results showed that the molybdenum concentration in the GAMW60B sample was 0.38 mg/L, which is 3.8 times the GWPS of 0.1 mg/l for molybdenum. It should be noted, however, that the results for both wells are within the range of the previous concentrations found at these wells.

3.0 DATA EVALUATION AND COMPARISON TO PREVIOUS RESULTS

Consistent with previous monitoring events and in accordance with the CCR Rule, Golder performed a statistical evaluation of groundwater analytical results from the eighth Assessment Monitoring event (September 2021) at the WDA. The statistical evaluation was completed on January 17, 2022 and the statistical evaluation results indicated the lower confidence level (LCL) concentrations for lithium and molybdenum in assessment monitoring well GAMW51B and molybdenum in assessment monitoring well GAMW60B exceeded the GWPS, which are interpreted as apparent evidence of SSLs in those wells.

As noted above, Golder previously identified similar concentrations of lithium and molybdenum in GAMW51B after the fourth (October 2019) Assessment Monitoring event at the WDA. In response, Golder prepared an ASD, dated June 9, 2020 (Golder 2020), that showed the source material characteristics and site hydrogeology indicate that the apparent lithium and molybdenum SSLs observed in GAMW51B were not due to a release from the WDA.

Furthermore, monitoring well GAMW60B was installed downgradient of wells GAMW51 and GAMW51B in 2019 to further assess the nature and extent and overall groundwater quality farther downgradient of the WDA. Since GAMW60B is further downgradient then GAMW51B from the WDA and the ASD determined that previous SSLs observed at GAMW51B were not due to a release from the WDA, it follows that the current apparent SSLs observed at both GAMW51B and GAMW60B are not due to a release from the WDA.

4.0 CONCLUSIONS

Golder's evaluation of the groundwater results for the eighth Assessment Monitoring event confirm that the lithium and molybdenum results are consistent with those from the previous Assessment Monitoring events, and the rationale presented in the June 9, 2020 ASD is still applicable.

As described above and in the ASD, the source material characteristics and site hydrogeology indicate that the source of the apparent lithium and molybdenum SSLs observed in GAMW51B and the apparent molybdenum SSL in GAMW60B are due to a different condition and not due to a release from the WDA. Therefore, no further action (e.g., Assessment of Corrective Measures) is warranted, and the WDA will remain in Assessment Monitoring.

5.0 REFERENCES

Golder 2020. Alternative Source Demonstration – Waste Disposal Area, Golder Associates Inc., June 9, 2020.

Golder 2020. Recertification of R.M. Schahfer Waste Disposal Area Alternative Source Demonstration, Golder Associates Inc., December 4, 2020.

Golder 2021. Recertification of R.M. Schahfer Waste Disposal Area Alternative Source Demonstration, Golder Associates Inc., May 18, 2021.

Golder 2021. Recertification of R.M. Schahfer Waste Disposal Area Alternative Source Demonstration, Golder Associates Inc., November 12, 2021.

APPENDIX K

R. M. Schahfer Landfill Phase V and Phase VI Alternative Source Demonstration- March 2021

Northern Indiana Public Service Company LLC
(NIPSCO LLC)

R. M. Schahfer Generating Station

Wheatfield, Indiana

Schahfer Landfill Phase V, Phase VI, and Phase VII

Certification of Alternative Source Demonstration

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of restricted waste landfills and groundwater monitoring systems for them, do hereby state that I am qualified in the subject matter of CCR management, groundwater monitoring, data interpretation, and groundwater impacts. I have personally examined and am familiar with this alternative source demonstration (ASD) for the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder, and dated March 2021. Based on an inquiry of those individuals immediately responsible, and on supporting data which I understand to be true, accurate and complete, I verify the information in this ASD is accurate and meets the applicable requirements of the CCR Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as Phase V, Phase VI, and Phase VII has been prepared and meets the applicable requirements of 40 CFR §257.94(e)(2).

Daniel Sullivan

Daniel Sullivan
Indiana Professional Engineer
License # 19600309



3-31-2021

Date

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	))))	Order No. 202-26-20

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 25B
Schahfer CCR Part A Demonstration
Addendum
Part 2

TECHNICAL MEMORANDUM

DATE March 31, 2021 **Project No.** 19121567

TO Dan Sullivan, Jeff Loewe NIPSCO LLC

CC Maggie Rice, Maureen Turman, Craig Myers, Joe Kutch, Mark Haney, Jim Peace, Danielle Sylvia Cofelice

FROM Krysta Cione **EMAIL kcione@golder.com**

RE: R.M. SCHAHFER LANDFILL PHASES V, VI, AND VII ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO LLC), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the seventh (September 2020) groundwater Detection Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Landfill Phase V, Phase VI, and Phase VII (CCR Unit) in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, “Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule” (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

Statistical analyses of Appendix III groundwater Detection Monitoring results indicated statistically significant increases (SSIs) for seven analytes detected in groundwater samples collected from downgradient wells compared to background levels. Although determination of an SSI generally indicates that the groundwater monitoring program should transition from Detection Monitoring to Assessment Monitoring, 40 CFR §257.94(e)(2) allows the owner or operator (i.e., NIPSCO LLC) to demonstrate that a source other than the CCR unit or another condition caused the apparent SSI(s). Golder identified similar SSIs after the first (October 2017) Detection Monitoring event at the RMSGS Landfill Phase V and Phase VI and submitted an Alternative Source Demonstration (ASD) on April 13, 2018. As described in that ASD, the conceptual site model, historical groundwater data, and Phase V and Phase VI landfill design indicate the source of the identified SSIs is the unlined portion of the landfill, Phases I and II, which is not regulated by the CCR Rule. Golder recertified the ASD based on the second (February/March 2018) Detection Monitoring Event, on August 28, 2018; the third (September 2018) Detection Monitoring Event, on March 21, 2019; the fourth (March 2019) Detection Monitoring Event, on September 6, 2019; the fifth (October 2019) Detection Monitoring Event, on May 7, 2020; and the sixth (March 2020) Detection Monitoring Event, on September 29, 2020.

NIPSCO constructed a new landfill cell (Phase VII) immediately north of Phase VI in 2018. Due to the proximity of Phase VII to Phase VI and landfill construction activities, Golder decommissioned monitoring wells GAMW-21/21B, GAMW-22/22B, GAMW-23/23B, and GAMW-28/28B, which were part of the original CCR Rule-required landfill monitoring network. Golder collected groundwater samples from these original four well pairs from July 2016 to March 2018. To replace the decommissioned wells, Golder installed monitoring wells GAMW-38/38B, GAMW-39/39B, GAMW-40/40B, and GAMW-41/41B downgradient and along the waste boundary of Phase VII in April and May 2018.

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Golder collected groundwater samples from existing and replacement monitoring wells during the September 2020 semi-annual monitoring event. Groundwater analytical data obtained from groundwater samples collected from the downgradient wells in these subsequent events were consistent with historical analytical results. As discussed in the ASD recertification dated September 6, 2019, Golder calculated new prediction limits in June 2019 using all background data collected through March 2019. The table below provides the original prediction limits calculated in January 2018 and the revised prediction limits calculated in June 2019. Golder will re-evaluate the background dataset following collection of an additional four rounds of groundwater data from the background wells.

1.0 SUMMARY OF RESULTS

The results of the seventh Detection Monitoring event are included in the 2020 Annual Report and the results of the statistical analysis are summarized below. SSIs were detected in groundwater samples collected from monitoring wells downgradient of the RMSGS Landfill Phase V, Phase VI, and Phase VI, for all Appendix III parameters. Overall, results are consistent with those collected previously and indicate few differences from the SSIs detected during the previous Detection Monitoring events. The differences are likely due to normal or temporal fluctuations in groundwater quality. The SSI results are summarized in the table below by well location and timeframe of the SSI exceedance.

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
GAMW21*							
GAMW21B*	1,2	1,2	1		1,2		1,2
GAMW22*		2					
GAMW22B*	1,2	1,2	1,2		1,2		1,2
GAMW23*	1,2	1,2			1,2	1,2	1,2
GAMW23B*	1,2	1,2	1,2		1,2	1,2	1,2
GAMW26				1,3,5,6,7			2
GAMW26B		1,3,7	3,7		1,3,7	3	1,3,7
GAMW27	1,2,3,4,5,6,7	1,2,3,4,5,6,7			1,2,3,4,6,7		1,2,3,4,6,7
GAMW27B	1,2,3,4,5,6,7	1,2,3,5,6,7	1,2,3,4,5,6,7		1,2,3,4,5,6,7	3	1,2,3,4,5,6,7
GAMW28*	1,2	1,2	1		1,2		1,2

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
GAMW28B*	1,2	1,2	1,2		1,2		1,2
GAMW38							
GAMW38B	3,4,5,6,7	3,4,5,6,7	3,4		3,4,5,6,7		3,4,5,6,7
GAMW39	3	3,4,5,6,7			3	5	3
GAMW39B	3,4,5,6,7	3,4,5,6,7	3,4,5,6,7		3,4,5,6,7	5	3,4,5,6,7
GAMW40	3,4,6	3,4,5,6,7			3		3,4,5,6,7
GAMW40B	3,4,5,6,7	3,4,5,6,7	3,4,5,6,7		3,4,5,6,7	3,4,6	3,4,5,6,7
GAMW41	4,5,6,7	4,5,6,7	4,5,6,7		4,5,6,7		4,5,6,7
GAMW41B	4,5,6,7	4,6,7	4,5,6,7		4,5,6,7	6,7	4,5,6,7

"1" Indicates a statistically significant increase detected in the first Detection Monitoring event
"2" Indicates a statistically significant increase detected in the second Detection Monitoring event
"3" Indicates a statistically significant increase detected in the third Detection Monitoring event
"4" Indicates a statistically significant increase detected in the fourth Detection Monitoring event
"5" Indicates a statistically significant increase detected in the fifth Detection Monitoring event
"6" Indicates a statistically significant increase detected in the sixth Detection Monitoring event
"7" Indicates a statistically significant increase detected in the seventh Detection Monitoring event
"*" Indicates monitoring well was decommissioned prior to the third Detection Monitoring event

2.0 ALTERNATIVE SOURCE DEMONSTRATION CONCLUSION

The preceding information indicates the results of the seventh Detection Monitoring event are consistent with the previous Detection Monitoring events, and the rationale behind the ASD dated April 13, 2018 is still applicable. Golder prepared the ASD in accordance with 40 CFR 257.94(e)(2) and it supports the finding that the SSIs determined on December 18, 2020 are not due to a release from the CCR Unit. As described in that 2018 ASD, the conceptual site model, historical groundwater data, and the Phase V, Phase VI, and Phase VII landfill design indicate that a release from the unlined portion of the landfill not subject to the CCR Rule, Phases I and II, is the source of the identified SSIs. Therefore, no further action (i.e., Assessment Monitoring) is warranted, and the Schahfer Landfill Phases V, VI, and VII will remain in Detection Monitoring.

3.0 REFERENCES

Golder Associates, "Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration", April 13, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, August 28, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, March 31, 2019.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 6, 2019.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, May 7, 2020.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 29, 2020.

https://golderassociates.sharepoint com/sites/nipscoccrgwmonitoring/shared documents/rmsgs/reports/landfill asd recertifications/2021-march/draft/draft landfill asd recertification.docx

APPENDIX L

R. M. Schahfer Landfill Phase V and Phase VI Alternative Source Demonstration- October 2021

Northern Indiana Public Service Company LLC
(NIPSCO LLC)

R. M. Schahfer Generating Station

Wheatfield, Indiana

Schahfer Landfill Phase V, Phase VI, and Phase VII

Certification of Alternative Source Demonstration

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of restricted waste landfills and groundwater monitoring systems for them, do hereby state that I am qualified in the subject matter of CCR management, groundwater monitoring, data interpretation, and groundwater impacts. I have personally examined and am familiar with this alternative source demonstration (ASD) for the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder, and dated October 2021. Based on an inquiry of those individuals immediately responsible, and on supporting data which I understand to be true, accurate and complete, I verify the information in this ASD is accurate and meets the applicable requirements of the CCR Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as Phase V, Phase VI, and Phase VII has been prepared and meets the applicable requirements of 40 CFR §257.94(e)(2).

Daniel Sullivan

Daniel Sullivan
Indiana Professional Engineer
License # 19600309

10.26.2021

Date



TECHNICAL MEMORANDUM

DATE October 26, 2021 **Project No.** 19121567

TO Dan Sullivan, Jeff Loewe NIPSCO LLC

CC Maggie Rice, Maureen Turman, Joe Kutch, Mark Haney, Jim Peace

FROM Danielle Sylvia Cofelice **EMAIL dsylvia@golder.com**

RE: R.M. SCHAHFER LANDFILL PHASES V, VI, AND VII ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the eighth (April 2021) groundwater Detection Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Landfill Phase V, Phase VI, and Phase VII (CCR Unit) in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule" (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

Statistical analyses of Appendix III groundwater Detection Monitoring results indicated statistically significant increases (SSIs) for seven analytes detected in groundwater samples collected from downgradient wells compared to background levels. Although determination of an SSI generally indicates that the groundwater monitoring program should transition from Detection Monitoring to Assessment Monitoring, 40 CFR §257.94(e)(2) allows the owner or operator (i.e., NIPSCO LLC) to demonstrate that a source other than the CCR unit or another condition caused the apparent SSI(s). Golder identified similar SSIs after the first (October 2017) Detection Monitoring event at the RMSGS Landfill Phase V and Phase VI and submitted an Alternative Source Demonstration (ASD) on April 13, 2018. As described in that ASD, the conceptual site model, historical groundwater data, and Phase V and Phase VI landfill design indicate the source of the identified SSIs is the unlined portion of the landfill, Phases I and II, which is not regulated by the CCR Rule. Golder recertified the ASD based on the second (February/March 2018) Detection Monitoring Event, on August 28, 2018; the third (September 2018) Detection Monitoring Event, on March 21, 2019; the fourth (March 2019) Detection Monitoring Event, on September 6, 2019; the fifth (October 2019) Detection Monitoring Event, on May 7, 2020; the sixth (March 2020) Detection Monitoring Event, on September 29, 2020, and the seventh (October 2020) Detection Monitoring Event, on March 31, 2021.

NIPSCO constructed a new landfill cell (Phase VII) immediately north of Phase VI in 2018. Phase VII is constructed in a similar manner to Phase V and Phase VI. Due to the proximity of Phase VII to Phase VI and landfill construction activities, Golder decommissioned monitoring wells GAMW-21/21B, GAMW-22/22B, GAMW-23/23B, and GAMW-28/28B, which were part of the original CCR Rule-required landfill monitoring network. Golder collected groundwater samples from these original four well pairs from July 2016 to March 2018. To replace the decommissioned wells, Golder installed monitoring wells GAMW-38/38B, GAMW-39/39B, GAMW-40/40B, and GAMW-41/41B downgradient and along the waste boundary of Phase VII in April and May 2018.

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Golder collected groundwater samples from existing and replacement monitoring wells during the September 2020 semi-annual monitoring event. Groundwater analytical data obtained from groundwater samples collected from the downgradient wells in these subsequent events were consistent with historical analytical results.

As discussed in the ASD recertification dated September 6, 2019, Golder calculated new prediction limits in June 2019 using all background data collected through March 2019. Again, in July 2021, Golder reviewed the analytical data collected to date and considered the option to update the prediction limits. The Groundwater Monitoring Program Implementation Manual (GMPIM, 2017) and the Unified Guidance allow for updating the statistical limits after a minimum of four "new measurements" are available. The periodic update of background datasets improves statistical power and accuracy by providing a more complete approximation of the true background population. The analytical data collected, and groundwater flow directions observed to date, indicate the chosen background wells are still representative of background conditions. The table below provides the original prediction limits calculated in January 2018, the revised prediction limits calculated in June 2019, and the revised prediction limits calculated in July 2021. Golder will re-evaluate the background dataset following collection of an additional four rounds of groundwater data from the background wells.

1.0 SUMMARY OF RESULTS

The results of the eighth Detection Monitoring event will be included in the 2021 Annual Report and the results of the statistical analysis are summarized below. SSIs were detected in groundwater samples collected from monitoring wells downgradient of the RMSGS Landfill Phase V, Phase VI, and Phase VI, for all Appendix III parameters. Overall, results are consistent with those collected previously and indicate few differences from the SSIs detected during the previous Detection Monitoring events. The differences are likely due to normal or temporal fluctuations in groundwater quality. The SSI results are summarized in the table below by well location and timeframe of the SSI exceedance.

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
Prediction Level (2021)	**3.8**	**230**	**50.21**	**2.3**	**670**	**6.184-8.163**	**1210**
GAMW21*							
GAMW21B*	1,2	1,2	1		1,2		1,2
GAMW22*		2					
GAMW22B*	1,2	1,2	1,2		1,2		1,2
GAMW23*	1,2	1,2			1,2	1,2	1,2
GAMW23B*	1,2	1,2	1,2		1,2	1,2	1,2
GAMW26				1,3,5,6,7, 8			2

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
Prediction Level (2021)	**3.8**	**230**	**50.21**	**2.3**	**670**	**6.184-8.163**	**1210**
GAMW26B		1,3,7	3,7		1,3,7	3	1,3,7
GAMW27	1,2,3,4,5,6,7,8	1,2,3,4,5,6,7,8			1,2,3,4,6,7,8		1,2,3,4,6,7,8
GAMW27B	1,2,3,4,5,6,7,8	1,2,3,5,6,7,8	1,2,3,4,5,6,7,8		1,2,3,4,5,6,7,8	3	1,2,3,4,5,6,7,8
GAMW28*	1,2	1,2	1		1,2		1,2
GAMW28B*	1,2	1,2	1,2		1,2		1,2
GAMW38							
GAMW38B	3,4,5,6,7,8	3,4,5,6,7,8	3,4		3,4,5,6,7,8		3,4,5,6,7,8
GAMW39	3	3,4,5,6,7			3	5	3
GAMW39B	3,4,5,6,7,8	3,4,5,6,7,8	3,4,5,6,7,8		3,4,5,6,7,8	5	3,4,5,6,7,8
GAMW40	3,4,6	3,4,5,6,7,8			3		3,4,5,6,7,8
GAMW40B	3,4,5,6,7,8	3,4,5,6,7	3,4,5,6,7,8		3,4,5,6,7,8	3,4,6,8	3,4,5,6,7,8
GAMW41	4,5,6,7,8	4,5,6,7	4,5,6,7,8		4,5,6,7,8		4,5,6,7,8
GAMW41B	4,5,6,7,8	4,6,7	4,5,6,7,8		4,5,6,7,8	6,7	4,5,6,7,8

"1" Indicates a statistically significant increase detected in the first Detection Monitoring event
"2" Indicates a statistically significant increase detected in the second Detection Monitoring event
"3" Indicates a statistically significant increase detected in the third Detection Monitoring event
"4" Indicates a statistically significant increase detected in the fourth Detection Monitoring event
"5" Indicates a statistically significant increase detected in the fifth Detection Monitoring event
"6" Indicates a statistically significant increase detected in the sixth Detection Monitoring event
"7" Indicates a statistically significant increase detected in the seventh Detection Monitoring event
"8" Indicates a statistically significant increase detected in the eighth Detection Monitoring event
"*" Indicates monitoring well was decommissioned prior to the third Detection Monitoring event

2.0 ALTERNATIVE SOURCE DEMONSTRATION CONCLUSION

The preceding information indicates the results of the eighth Detection Monitoring event are consistent with the previous Detection Monitoring events, and the rationale behind the ASD dated April 13, 2018 is still applicable. Golder prepared the ASD in accordance with 40 CFR 257.94(e)(2) and it supports the finding that the SSIs determined on July 28, 2021 are not due to a release from the CCR Unit. As described in that 2018 ASD, the conceptual site model, historical groundwater data, and the Phase V, Phase VI, and Phase VII landfill design indicate that a release from the unlined portion of the landfill not subject to the CCR Rule, Phases I and II, is the source of the identified SSIs. Therefore, no further action (i.e., Assessment Monitoring) is warranted, and the Schahfer Landfill Phases V, VI, and VII will remain in Detection Monitoring.

3.0 REFERENCES

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, April 13, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, August 28, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, March 31, 2019.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 6, 2019.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, May 7, 2020.

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Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, March 31, 2021.

https://golderassociates.sharepoint com/sites/nipscoccrgwmonitoring/shared documents/rmsgs/reports/landfill asd recertifications/2021-october/draft/draft landfill asd recertification docx

APPENDIX M

R. M. Schahfer Landfill Phase V and Phase VI Alternative Source Demonstration- March 2022

Northern Indiana Public Service Company LLC
(NIPSCO LLC)

R. M. Schahfer Generating Station

Wheatfield, Indiana

Schahfer Landfill Phase V, Phase VI, and Phase VII

Certification of Alternative Source Demonstration

I, Daniel Sullivan, being a Professional Engineer in accordance with the laws of the State of Indiana, and having experience in the design, construction, and operation of restricted waste landfills and groundwater monitoring systems for them, do hereby state that I am qualified in the subject matter of CCR management, groundwater monitoring, data interpretation, and groundwater impacts. I have personally examined and am familiar with this alternative source demonstration (ASD) for the NIPSCO LLC R. M. Schahfer Generating Station, prepared by Golder, and dated March 2022. Based on an inquiry of those individuals immediately responsible, and on supporting data which I understand to be true, accurate and complete, I verify the information in this ASD is accurate and meets the applicable requirements of the CCR Rule. In consideration of the above, I certify to the best of my knowledge, information, and belief, that the ASD for the regulated CCR management unit referred to as Phase V, Phase VI, and Phase VII has been prepared and meets the applicable requirements of 40 CFR §257.94(e)(2).

Daniel Sullivan
Indiana Professional Engineer
License # 19600309



3.25.2022
Date

TECHNICAL MEMORANDUM

DATE March 25, 2022 **Project No.** 19121567

TO Dan Sullivan, Jeff Loewe NIPSCO LLC

CC Maggie Rice, Maureen Turman, Joe Kutch, Mark Haney, Jim Peace, Thomas Haskins

FROM Danielle Sylvia Cofelice **EMAIL dsylvia@golder.com**

RE: R.M. SCHAHFER LANDFILL PHASES V, VI, AND VII ALTERNATIVE SOURCE DEMONSTRATION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates Inc. (Golder) performed a statistical evaluation of groundwater analytical results from the ninth (September 2021) groundwater Detection Monitoring event at the Rollin M. Schahfer Generating Station (RMSGS) Landfill Phase V, Phase VI, and Phase VII (CCR Unit) in accordance with 40 Code of Federal Regulations (CFR) Parts 257 and 261, "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule" (CCR Rule), as amended, and corresponding regulations under 329 Indiana Administrative Code (IAC) 10-9-1.

Statistical analyses of Appendix III groundwater Detection Monitoring results indicated statistically significant increases (SSIs) for five analytes detected in groundwater samples collected from downgradient wells compared to background levels. Although determination of an SSI generally indicates that the groundwater monitoring program should transition from Detection Monitoring to Assessment Monitoring, 40 CFR §257.94(e)(2) allows the owner or operator (i.e., NIPSCO) to demonstrate that a source other than the CCR unit or another condition caused the apparent SSI(s). Golder identified similar SSIs after the first (October 2017) Detection Monitoring event at the RMSGS Landfill Phase V and Phase VI and submitted an Alternative Source Demonstration (ASD) on April 13, 2018. As described in that ASD, the conceptual site model, historical groundwater data, and Phase V and Phase VI landfill design indicate the source of the identified SSIs is the unlined portion of the landfill, Phases I and II, which is not regulated by the CCR Rule. Golder recertified the ASD based on the second (February/March 2018) Detection Monitoring Event, on August 28, 2018; the third (September 2018) Detection Monitoring Event, on March 21, 2019; the fourth (March 2019) Detection Monitoring Event, on September 6, 2019; the fifth (October 2019) Detection Monitoring Event, on May 7, 2020; the sixth (March 2020) Detection Monitoring Event, on September 29, 2020, the seventh (October 2020) Detection Monitoring Event, on March 31, 2021; and the eighth (April 2021) Detection Monitoring Event, on October 26, 2021.

NIPSCO constructed a new landfill cell (Phase VII) immediately north of Phase VI in 2018. Phase VII is constructed in a similar manner to Phase V and Phase VI. Due to the proximity of Phase VII to Phase VI and landfill construction activities, Golder decommissioned monitoring wells GAMW-21/21B, GAMW-22/22B, GAMW-23/23B, and GAMW-28/28B, which were part of the original CCR Rule-required landfill monitoring network. Golder collected groundwater samples from these original four well pairs from July 2016 to March 2018. To replace the decommissioned wells, Golder installed monitoring wells GAMW-38/38B, GAMW-39/39B, GAMW-40/40B, and GAMW-41/41B downgradient and along the waste boundary of Phase VII in April and May 2018.

Golder Associates Inc.
670 North Commercial Street, Suite 103, Manchester, NH 03101 T: +1 603 668-0880 F: +1 603 668-1199

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Golder first collected groundwater samples from existing and replacement monitoring wells during the September 2020 semi-annual monitoring event. Groundwater analytical data obtained from groundwater samples collected from the downgradient wells in the subsequent events were consistent with historical analytical results.

As discussed in the ASD recertification dated September 6, 2019, Golder calculated new prediction limits in June 2019 using all background data collected through March 2019. Again, in July 2021, Golder reviewed the analytical data collected to date and chose the option to update the prediction limits. The Groundwater Monitoring Program Implementation Manual (GMPIM, 2017) and the Unified Guidance allow for updating the statistical limits after a minimum of four "new measurements" are available. The periodic update of background datasets improves statistical power and accuracy by providing a more complete approximation of the true background population. The analytical data collected, and groundwater flow directions observed to date, indicate the chosen background wells are still representative of background conditions. The table below provides the original prediction limits calculated in January 2018, the revised prediction limits calculated in June 2019, and the revised prediction limits calculated in July 2021. Golder will re-evaluate the background dataset following collection of an additional four rounds of groundwater data from the background wells.

1.0 SUMMARY OF RESULTS

The results of the ninth Detection Monitoring event were included in the 2021 Annual Groundwater Monitoring and Corrective Action Report and the results of the statistical analysis are summarized below. SSIs were detected in groundwater samples collected from monitoring wells downgradient of the RMSGS Landfill Phase V, Phase VI, and Phase VI, for all Appendix III parameters. Overall, results are consistent with those collected previously and indicate few differences from the SSIs detected during the previous Detection Monitoring events. The differences are likely due to normal or temporal fluctuations in groundwater quality. The SSI results are summarized in the table below by well location and timeframe of the SSI exceedance.

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
Prediction Level (2021)	**3.8**	**230**	**50.21**	**2.3**	**670**	**6.184-8.163**	**1210**
GAMW21*							
GAMW21B*	1,2	1,2	1		1,2		1,2
GAMW22*		2					
GAMW22B*	1,2	1,2	1,2		1,2		1,2
GAMW23*	1,2	1,2			1,2	1,2	1,2
GAMW23B*	1,2	1,2	1,2		1,2	1,2	1,2
GAMW26				1,3,5,6,7, 8			2

Monitoring Well ID	Boron	Calcium	Chloride	Fluoride	Sulfate	pH	TDS
Prediction Level (2018)	**1.7**	**116.1**	**34.91**	**2.3**	**300**	**6.465-7.739**	**653.4**
Prediction Level (2019)	**3.2**	**130.9**	**39.93**	**2.3**	**470**	**6.353-7.82**	**1100**
Prediction Level (2021)	**3.8**	**230**	**50.21**	**2.3**	**670**	**6.184-8.163**	**1210**
GAMW26B		1,3,7	3,7		1,3,7	3	1,3,7
GAMW27	1,2,3,4,5,6,7,8,9	1,2,3,4,5,6,7,8,9			1,2,3,4,6,7,8,9		1,2,3,4,6,7,8,9
GAMW27B	1,2,3,4,5,6,7,8,9	1,2,3,5,6,7,8,9	1,2,3,4,5,6,7,8,9		1,2,3,4,5,6,7,8,9	3	1,2,3,4,5,6,7,8,9
GAMW28*	1,2	1,2	1		1,2		1,2
GAMW28B*	1,2	1,2	1,2		1,2		1,2
GAMW38							
GAMW38B	3,4,5,6,7,8,9	3,4,5,6,7,8,9	3,4		3,4,5,6,7,8,9		3,4,5,6,7,8,9
GAMW39	3	3,4,5,6,7			3	5	3
GAMW39B	3,4,5,6,7,8,9	3,4,5,6,7,8,9	3,4,5,6,7,8,9		3,4,5,6,7,8,9	5	3,4,5,6,7,8,9
GAMW40	3,4,6,9	3,4,5,6,7,8,9			3		3,4,5,6,7,8,9
GAMW40B	3,4,5,6,7,8,9	3,4,5,6,7	3,4,5,6,7,8,9		3,4,5,6,7,8,9	3,4,6,8	3,4,5,6,7,8,9
GAMW41	4,5,6,7,8,9	4,5,6,7	4,5,6,7,8		4,5,6,7,8,9		4,5,6,7,8,9
GAMW41B	4,5,6,7,8,9	4,6,7,9	4,5,6,7,8,9		4,5,6,7,8,9	6,7	4,5,6,7,8,9

"1" Indicates a statistically significant increase detected in the first Detection Monitoring event
"2" Indicates a statistically significant increase detected in the second Detection Monitoring event
"3" Indicates a statistically significant increase detected in the third Detection Monitoring event
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"6" Indicates a statistically significant increase detected in the sixth Detection Monitoring event
"7" Indicates a statistically significant increase detected in the seventh Detection Monitoring event
"8" Indicates a statistically significant increase detected in the eighth Detection Monitoring event
"9" Indicates a statistically significant increase detected in the ninth Detection Monitoring event
"*" Indicates monitoring well was decommissioned prior to the third Detection Monitoring event

2.0 ALTERNATIVE SOURCE DEMONSTRATION CONCLUSION

The preceding information indicates the results of the ninth Detection Monitoring event are consistent with the previous Detection Monitoring events, and the rationale behind the ASD dated April 13, 2018 is still applicable. Golder prepared the ASD in accordance with 40 CFR 257.94(e)(2) and it supports the finding that the SSIs determined on December 27, 2021 are not due to a release from the CCR Unit. As described in that 2018 ASD, the conceptual site model, historical groundwater data, and the Phase V, Phase VI, and Phase VII landfill design indicate that a release from the unlined portion of the landfill not subject to the CCR Rule, Phases I and II, is the source of the identified SSIs. Therefore, no further action (i.e., Assessment Monitoring) is warranted, and the Schahfer Landfill Phases V, VI, and VII will remain in Detection Monitoring.

3.0 REFERENCES

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, April 13, 2018.

Golder Associates, “Northern Indiana Public Service Company R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, August 28, 2018.

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Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, May 7, 2020.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, September 29, 2020.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, March 31, 2021.

Golder Associates, “Northern Indiana Public Service Company LLC R.M. Schahfer Generating Station Wheatfield, Indiana- Schahfer Landfill Phase V and Phase VI - Alternative Source Demonstration”, October 26, 2021.

APPENDIX N

CCR Assessment of Corrective Measures Addendum 2 – July 2021

REPORT

MCU Assessment of Corrective Measures - Addendum #2

Northern Indiana Public Service Company LLC

Rollin M. Schahfer Generating Station

Wheatfield, Indiana

Submitted to:

Northern Indiana Public Service Company LLC
801 East 86th Avenue
Merriville, Indiana 46410

Submitted by:

Golder Associates Inc.
670 North Commercial Street, Suite 103
Manchester, NH 03101
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20447130.01

July 2021

Northern Indiana Public Service Company LLC (NIPSCO)
R. M. Schahfer Generating Station – MSRB, MCWB and DA (collectively the Multi-Cell Unit [MCU] or CCR Unit)
Wheatfield, Indiana

Certification of Addendum #2 to the Assessment of Corrective Measures Report 40 CFR §257.96 & Corresponding Regulations under Indiana Administrative Code

I have personally reviewed Addendum #2 to the assessment of corrective measures (ACM) report that was prepared by Golder Associates Inc. (Golder) and dated July 2021. The subject of Addendum #2 to the ACM Report is three impoundments, the Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and Drying Area (DA), which are collectively referred to as the Multi-Cell Unit (MCU) or simply the CCR Unit, at the NIPSCO R. M. Schahfer Generating Station. Based on an inquiry of those individuals immediately responsible and on supporting data that I understand to be true, accurate, and complete, I verify the information in this Addendum #2 to the ACM Report is accurate and meets the applicable requirements of the CCR Rule and Indiana Administrative Code. In consideration of the above, I certify to the best of my knowledge, information, and belief, that Addendum #2 to the ACM Report for the regulated CCR management unit referred to as the MCU has been prepared and meets the applicable requirements of 40 CFR §257.96 and corresponding State of Indiana requirements.



Joseph Bernard Gormley, Jr.
Indiana Professional Engineer
License #: PE11900213

7/29/2021
Date

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APPENDICES

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Volume Calculations

APPENDI B
Slug Test Data and Calculations

APPENDI C
Vertical Gradient Calculation

APPENDI D
Monitored Natural Attenuation Evaluation

Acron ms

ACM	Assessment of Corrective Measures
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
cm/sec	Centimeter per second
COC	Constituents of Concern
CSM	Conceptual Site Model
DA	Drying Area
FGD	flue gas desulphurization
ft amsl	feet above mean sea level
ft bgs	feet below ground surface
GMPIM	Groundwater Monitoring Program Implementation Manual
gpm	gallons per minute
GWPS	Groundwater Protection Standards
IAC	Indiana Administrative Code
IDEM	Indiana Department of Environmental Management
IDNR	Indiana Department of Natural Resources
ISS	In situ Stabilization/Solidification
IRWDA	Inactive Retired Waste Disposal Area
MCL	Maximum Contaminant Level
MCWB	Metal Cleaning Waste Basin
mg/L	milligram per liter
MCU	Multi-Cell Unit
MNA	Monitored Natural Attenuation
MSRB	Material Storage Runoff Basin
MW	megawatt
NIPSCO	Northern Indiana Public Service Company
NPDES	National Pollutant Discharge Elimination System
O M	Operations Maintenance
POC	Point of Compliance
POTW	Publicly Owned Treatment Works
PRB	Permeable Reactive Barrier
RCG	Remediation Closure Guide
RMSGS	Rollin. M. Schahfer Generating Station
SSL	Statistically Significant Level
ug/L	microgram per liter
USEPA	United States Environmental Protection Agency
WDA	Waste Disposal Area

1.0 INTRODUCTION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder has prepared this Addendum 2 to supplement the findings of the April 2019 CCR Assessment of Corrective Measures (ACM) Report and replace the November 2020 ACM Addendum for three impoundments, the Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and Drying Area (DA), collectively the Multi-Cell Unit (MCU) or simply the CCR Unit at the NIPSCO Rollin M. Schahfer Generating Station (RMSGS, Site) (ACM Report, Golder 2019 and ACM Addendum 1, Golder 2020).

ACM Addendum 1 was prepared to provide further details of Golder s evaluation of the potential corrective measures for the MCU and specifically focuses on addressing the following requirements under 40 Code of Federal Regulations (CFR) §257.96(c)

> *"The assessment under paragraph (a) of this section must include an analysis of the effectiveness of potential corrective measures in meeting all of the requirements and objectives of the remedy as described under §257.97 addressing at least the following:*
>
> *1) The performance, reliability, ease of implementation, and potential impacts of appropriate potential remedies including safety impacts, cross-media impacts, and control of exposure to any residual contamination;*
>
> *2) The time required to begin and complete the remedy;*
>
> *3) The institutional requirements, such as state or local permit requirements or other environmental or public health requirements that may substantially affect implementation of the remedy(s)."*

ACM Addendum 2, which supersedes and fully replaces ACM Addendum 1, revises and updates information provided in the predecessor document and incorporates an enhanced final cap design in all corrective measures alternatives. Inclusion of the revised cap design affects the implementability of certain alternatives originally identified in the ACM and Addendum 1, effectively eliminating these alternatives from further consideration in ACM Addendum 2.

Key technical aspects of the cap design revision and update have been proposed to and discussed with the approving state regulatory agency for closure of the CCR Unit, Indiana Department of Environmental Management (IDEM), and the complete Closure Application is currently under IDEM review. Finalization of the ACM as envisioned in Addendum 2 and completion of the Selection of Remedy (SOR) processes is predicated upon IDEM s approval, in particular the source removal and final cap design aspects.

This Addendum 2 and remaining applicable sections of the ACM Report (Golder 2019) should be consulted in combination with one another.

2.0 BAC GROUND

NIPSCO owns and operates the RMSGS at 2723 E 1500 N Road, in Wheatfield, Jasper County, Indiana (see Figure 1). RMSGS manages coal combustion residuals (CCR) in surface impoundments subject to applicable requirements of 40 CFR Part 257 as amended (CCR Rule). Pursuant to 40 CFR §257.96(a), the MCU was subject to an ACM, the results of which were presented in the ACM Report (Golder 2019). Figures 2 through 7 show the monitoring well network, geologic cross sections, groundwater elevation contours and shallow/deep boron isoconcentration contour maps for the Site. Regional and Site Hydrogeology are summarized in the ACM

and supported by volume calculations, slug test data and calculations, and vertical gradient calculation included in Appendices A, B, and C, respectively.

NIPSCO plans to close the MCU by removal in accordance with 40 CFR §257.102(c) and an approved IDEM Closure Application. To meet the requirements of 40 CFR §257.97-98, NIPSCO s approach combines CCR source removal/capping followed by groundwater corrective measures and monitoring to demonstrate achievement of applicable groundwater protection standards (GWPS) shown in Table 1.

In the ACM Report (Golder 2019), Golder presented the analytical data for the MCU monitoring wells (see Table 2), identified general groundwater response actions (see Table 3), and presented an initial screening of corrective measure alternatives/process options for groundwater (see Table 4). In addition, Golder identified eight potential groundwater corrective measures for further consideration following the excavation of source material, verification of adequate removal, backfilling, and closure of the MCU. The potential corrective measures and their key components were summarized in Table 5 of the ACM Report (Golder 2019).

After preparation of the ACM Report and ACM Addendum 1, NIPSCO performed additional work with respect to future performance of the initially proposed closure approach and its possible impact on groundwater conditions. Based upon this assessment, NIPSCO determined that an enhanced combination soil/geomembrane cap along with a minor modification of the existing slurry wall, designed to alleviate potential groundwater level build up under the cap, would provide better long-term performance post-closure than either no cap or a soil-only cap. Consequently, NIPSCO proposed this alternative design to IDEM. As referenced above, as of this writing, consideration of the alternative design remains under IDEM review.

Because of NIPSCO s decision and subsequent proposal to IDEM to construct a low permeability cap in conjunction with source removal, it effectively removed groundwater corrective measure Alternative 2 Capping with Monitored Natural Attenuation (MNA) from future consideration. Furthermore, other alternatives that did not previously include or consider the implications of constructing a low permeability cap immediately following source removal including Alternative 4 In situ Stabilization/Solidification (ISS) and MNA, Alternative 6 Capping, Pump-and-Treat and MNA, and Alternative 8 ISS, Pump-and-Treat, and MNA were likewise removed from future consideration. Also, Alternative 1 MNA, Alternative 3 Vertical Barrier/Hydraulic Controls and MNA, Alternative 5 - Pump-and-Treat and MNA, and Alternative 7 Vertical Barrier/Hydraulic Controls, Pump-and-Treat, and MNA were modified to reflect the inclusion of a low permeability cap. In summary and as identified in the embedded table below, Alternatives 2, 4, 6, and 8 have been removed from future consideration in ACM Addendum 2, leaving four remaining alternatives in original or modified form under consideration.

Alternative	**Status**	**Comments**
Alternative 1 - Monitored Natural Attenuation (MNA)	Retained	MNA requires no modifications to the current closure strategy.
Alternative 2 - Capping and MNA	Removed	Capping is already included in the current closure strategy but remains under review by IDEM.
Alternative 3 - Vertical Barrier/Hydraulic Controls and MNA	Retained/Modified	Hydraulic controls can be integrated into the current closure strategy with limited modifications to the cap.

Alternative	Status	Comments
Alternative 4 - In situ Stabilization/Solidification (ISS) and MNA	Removed	ISS cannot be integrated into the current closure strategy without significant modifications and potentially severe damage to the cap.
Alternative 5 - Pump-and-Treat and MNA	Retained/Modified	Pump and treat can be integrated into the current closure strategy with no impact to the cap.
Alternative 6 - Capping, Pump-and-Treat, and MNA	Removed	Capping is already included in the current closure strategy.
Alternative 7 - Vertical Barrier/Hydraulic Control, Pump-and-Treat, and MNA	Retained/Modified	See comments for Alternatives 3 and 5.
Alternative 8 - ISS, Pump-and-Treat, and MNA	Removed	See comments for Alternative 4.

3.0 IDENTIFICATION OF POTENTIAL CORRECTIVE MEASURES

3.1 Source Material

As discussed in the ACM Report (Golder 2019) and referenced above, NIPSCO plans to close the MCU in accordance with 40 CFR §257.102(c) and an approved IDEM Closure Application. NIPSCO s approach combines CCR source removal/capping and groundwater remediation and monitoring to demonstrate achievement of the IDEM-approved Closure Application requirements and applicable GWPS. The multi-part corrective action approach will be integrated, but will be sequenced, to allow for monitoring of early-stage post-closure results and plume stability. This approach will facilitate optimization of subsequent steps following completion of the initial source removal and capping stages.

The first phase of the integrated corrective action approach is closure by removal/capping of the MCU. Following dewatering activities, the three impoundments will be excavated. In accordance with the Closure Application, excavations are being planned to remove CCR and non-CCR materials to the original design limits (sides and bottom) of the impoundments. Satisfactory excavation will be confirmed by a visual determination that the CCR materials have been removed (Wood 2021).

Following completion of CCR excavation and visual verification of the source removal activities, a final low permeability cap will be installed. As proposed to IDEM, the final cap will consist of the following components presented in descending order from top to bottom (Wood 2021):

- Topsoil (6-inch);
- Cover soil (18-inch);
- Geocomposite drainage layer (GDL);
- 40-mil linear low-density polyethylene (LLDPE) geomembrane; and
- Subgrade fill.

The low permeability cap (e.g., permeability less than or equal to 1 x 10-7 cm/sec) will reduce infiltration of rainwater into the closed CCR unit. In doing so it may further reduce the total volume of impacted groundwater requiring remediation.

During cap construction a hydraulically downgradient section of the slurry wall will be permanently removed down to the average elevation of the groundwater table to address the water buildup/overtopping possibility within the former impoundment. This action should reduce concerns regarding long-term cap performance and maintenance; however, it may result in periodic discharges from within the former impoundment of diluted groundwater that has previously been in contact with CCR.

Closure-by-removal construction activities including, but not limited to, dewatering and excavation of the CCR source material, removal of a portion of the existing slurry wall to the average elevation of the groundwater table, backfill of the closed impoundment, and placement of a low permeability cap are expected to affect the current groundwater flow regime within and in areas proximate to the MCU. Accordingly, NIPSCO will evaluate these impacts on groundwater remedy alternatives as a critical foundational component of the ongoing SOR process. IDEM requires NIPSCO to obtain their approval before closing the MCU; therefore, this stage of additional data collection will begin following IDEM s approval and during NIPSCO s implementation of the Closure Application. In addition to traditional long-term post-closure monitoring during closure implementation and in the early stages of post-closure, NIPSCO will perform remedy-focused groundwater monitoring activities. Beyond the Part 257 Appendix III and IV constituents, monitoring will include parameters specific to the applicability, appropriateness, and performance of MNA, continuing to build upon the results of the MNA Tier I-III evaluation previously completed. In short, NIPSCO will use the monitoring results to evaluate the impacts of source removal and associated closure construction activities and help inform and refine the groundwater remedy selection process as needed.

3.2 Ground ater Impacts

Following closure of the MCU by removal/capping, NIPSCO will address impacted groundwater below and downgradient of the MCU.

Because the existing slurry wall surrounding the MCU was installed to contact the underlying bedrock, installation of the low permeability cap will increase the possibility of creating a cell of isolated impacted groundwater beneath the MCU that will not be recharged through migration of un-impacted groundwater or infiltrating rainwater. Due to the history of CCR loading in the MCU, the capacity of the saturated zone within the slurry wall to naturally attenuate these isolated CCR impacts has likely been depleted relative to the aquifer outside the slurry wall. Therefore, there is also a potential for the isolated impacted groundwater within the MCU to be released downgradient if the slurry wall exceeds its operational lifetime or the water level inside the MCU rises and overtops the slurry wall. NIPSCO will also address these potential impacts if monitoring results do not indicate progress towards achievement of GWPS.

In the ACM Report (Golder 2019), Golder identified and preliminarily evaluated the following eight groundwater corrective measure alternatives for further consideration in accordance with the provisions of §257.96(c).

- Alternative 1 - Monitored Natural Attenuation (MNA)
- Alternative 2 - Capping and MNA
- Alternative 3 - Vertical Barrier and MNA

- Alternative 4 - In situ Stabilization/Solidification (ISS) and MNA
- Alternative 5 - Pump-and-Treat and MNA
- Alternative 6 - Capping, Pump-and-Treat, and MNA
- Alternative 7 - Vertical Barrier, Pump-and-Treat, and MNA
- Alternative 8 - ISS, Pump-and-Treat, and MNA

Golder s evaluation of the potential corrective measures and their key components were summarized in Table 5 of the ACM Report (Golder 2019). As noted above, previous Alternatives 2, 4, 6, and 8 have since been removed from future consideration due to a change in closure approach and previous Alternatives 1, 3, 5, and 7 have been modified for the same reason. For this Addendum 2, Golder is providing further supporting evaluation details with respect to each of the four remaining potential groundwater corrective measure alternatives. For clarification and to differentiate the ACM Addendum 2 alternatives from those presented and discussed in predecessor documents, the remaining alternatives are renumbered as follow:

- Alternative A MNA
- Alternative B Vertical Barrier/Hydraulic Controls and MNA
- Alternative C Pump-and-Treat and MNA
- Alternative D Vertical Barrier/Hydraulic Controls, Pump-and-Treat, and MNA

A summary of the retained groundwater corrective measure alternatives is shown in Table 5. The remedial components of the groundwater corrective measure alternatives following source removal and capping are described further in Section 4.

4.0 EVALUATION OF POTENTIAL GROUNDWATER CORRECTIVE MEASURES

4.1 Evaluation Criteria

In conformance with the applicable requirements of 40 CFR §257.96 and 40 CFR §257.97, Golder evaluated the effectiveness of each of the four remaining potential groundwater corrective measures originally identified in the ACM Report (Golder 2019) using the following criteria:

- **Performance** - Potential corrective measures were evaluated for their relative performance based on the magnitude of reduction of existing risks, ability to obtain the groundwater protection standard (GWPS) at the point of compliance (POC), the magnitude of residual risks in terms of likelihood of future releases due to remaining CCR following implementation of remedy, and the required type and degree of long-term management including monitoring, operation, and maintenance associated with the corrective measure.
- **Relia ilit** - Potential corrective measures were evaluated for their relative reliability based on the long-term reliability of engineering and institutional controls, potential need for the replacement of the remedy, extent to which containment practices will reduce further releases, and extent to which the treatment technologies may be used.

- **Ease of Implementation** - Potential corrective measures were evaluated based on their relative ease of implementation based on difficulty associated with construction of the technology, operational reliability of the technology(ies), coordination of regulatory approvals and permits from pertinent agencies, availability of necessary equipment and specialists, and availability capacity and location of needed treatment, storage, and disposal services.
- **Potential Impacts** - Potential corrective measures were evaluated based on their relative potential impacts based on safety impacts, cross-media impacts, and control of exposure. Exposure controls include short-term risks during implementation of a remedy and potential exposure to remaining wastes to the community or environment including potential threats associated with excavation, transportation, re-disposal of CCR, or contaminant.
- **Time Re uirements** - Potential corrective measures were evaluated based on the time required to initiate, construct, and complete the remedy.
- **Institutional Re uirements** - Potential corrective measures were evaluated based on their institutional requirements including local, state, and federal permit needs.

4.2 Evaluation Summaries

Relative to the above evaluation criteria, the following sections present brief summaries of the proposed groundwater corrective measure alternatives following source removal and capping. In addition, the summaries highlight areas where a particular remedy may perform well or poorly relative to other alternatives. A summary of Golder s evaluation of the four retained groundwater corrective measure alternatives is provided in Table 6.

4.2.1 Alternative A: Monitored Natural Attenuation

Golder evaluated MNA as a potential groundwater corrective measure for the Site COCs. The MNA Evaluation (Golder 2020) is presented in Appendix D. The results of the evaluation indicate that MNA is a technically feasible and appropriate corrective measure for groundwater at the Site based on the following factors:

- Attenuation is already occurring at the Site at a reasonable rate
- The dissolved plume is stable
- The aquifer has the long-term capacity to attenuate COCs

Based on the results of the Tier I, II, and III MNA evaluations for the Site, Golder concluded that MNA is expected to provide good long-term performance. MNA alone will not substantially affect groundwater concentrations in the short-term, however, it may show some progress within a few months of source material removal during closure of the MCU.

For the MNA evaluation, Golder conducted a point decay evaluation at monitoring wells downgradient of the MCU. Based on the results of the evaluation, maximum concentrations of boron and cobalt observed in downgradient wells over the period of monitoring would take approximately 41 and 39 years, respectively, to attenuate to concentrations below the GWPS (or health-based standard for boron) (Golder 2020).

For the evaluation, Golder also considered the following factors:

- The low groundwater flow velocities observed at the Site

- The distance from the MCU to the property boundary and lack of off-Site migration of groundwater impacts
- The lack of potable water supply wells at the Site in the vicinity of the MCU and the downgradient plume
- Planned institutional controls prohibiting use of groundwater from any impacted area at the Site for drinking water
- Lower observed boron concentrations at monitoring wells further downgradient from the MCU

Based on these other factors, MNA is expected to be protective of human health and reduce environmental degradation until the wells near the MCU achieve the cleanup criteria.

Because there is an existing monitoring well network downgradient of the MCU, implementation of an MNA program is unlikely to require any component construction/installation. In addition, it does not require disturbance of the complex subsurface utility network located hydraulically downgradient of the MCU. Therefore, MNA will be relatively easy to implement following regulatory approval and poses no short-term safety risks. Long-term operation and maintenance (O M) will include routine groundwater sampling and potentially periodic well redevelopment.

4.2.2 Alternative B: Vertical Barrier H draulic Controls and MNA

For the Vertical Barrier/Hydraulic Control and MNA Alternative, hydraulic controls within the existing slurry wall would be added to the MNA alternative. The Vertical Barrier/Hydraulic Control and MNA alternative would be implemented to reduce or eliminate downgradient migration of impacted groundwater. This alternative assumes that the existing slurry wall is intact, albeit slightly modified from the original design to address potential water buildup with the former impoundment cell, and that implementation of this alternative involves installation and operation of a pump-and-treat system within the former impoundment areas to prevent over-topping of the modified slurry wall due to groundwater recharge.

The Vertical Barrier/Hydraulic Control and MNA Alternative would have a similar effect as the MNA Alternative on groundwater downgradient of the closed MCU. It would reduce or eliminate the volume of impacted groundwater potentially overtopping the existing or modified slurry wall(s), thus removing a source of contamination, and allowing for more efficient natural attenuation. This remedy would also result in removal of contaminant mass through groundwater extraction and treatment with boron-specific ion exchange resin, which would reduce the potential for future releases of impacted groundwater if the slurry wall fails.

Because there is an existing and functional slurry wall around the MCU, corrective measure implementation would include design, well installation, enclosure construction, and treatment system assembly/construction. Some treatment system components may require lead times prior to delivery; however, most components should be readily available. An amendment to the Site s National Pollutant Discharge Elimination System (NPDES) permit would likely be required to discharge treated water to an on-site stormwater pond, which could delay implementation while awaiting regulatory review.

Resin regeneration requires concentrated sodium hydroxide and hydrochloric acid, which could be released and cause damage to the environment in the event of a containment breach. Likewise, in the event of unidentified contaminant breakthrough, there is the potential for treated water containing unacceptable contaminant levels to be discharged in the treatment system effluent. However, both of these events are unlikely to occur as the reagents will be stored in secondary containment and resin regeneration will be completed automatically on a regular basis to maintain the resin at a high level of removal efficiency.

The hydraulic control system will require a higher level of periodic O M compared to the MNA Alternative as influent and effluent samples will likely need to be collected monthly and there is significant potential for shut-downs due to the number of different components (filter vessels, ion-exchange columns, slurry dryer, pH adjustment system, etc.) that are needed to keep the system operational. Most or all of these components will also need replacement over the 30-year design lifetime of the system.

4.2.3 Alternative C: Pump-and-Treat and MNA

For the Pump-and-Treat and MNA Alternative, a groundwater pump-and-treat system would be designed and installed to capture contaminated groundwater present in the downgradient vicinity of the MCU and/or potentially leaking through/under the CCR slurry wall, to prevent downgradient off-Site migration. The captured groundwater would then be treated to reduce concentrations to an acceptable concentration and discharged to surface water or groundwater.

The Pump-and-Treat and MNA Alternative offers a higher level of short- and long-term protection than capping and ISS as it removes contaminant mass through treatment of extracted water using ion-exchange resin. This will help reduce contaminant concentrations and thereby enhance natural attenuation downgradient of the capture zone. The capture zone is extensive enough that continued operation of the pump-and-treat system will also contain any future groundwater releases if the slurry wall fails.

Some treatment system components may require lead times prior to delivery, but most components should be readily available. An amendment to the Site s NPDES permit would likely be required to discharge treated water to an on-site stormwater pond, which could delay implementation while awaiting regulatory review. Resin regeneration requires concentrated sodium hydroxide and hydrochloric acid, which could be released and cause damage to the environment in the event of a containment breach. Likewise, in the event of unidentified contaminant breakthrough, there is the potential for treated water containing unacceptable contaminant levels to be discharged. However, both of these events are unlikely to occur as the any reagents will be stored in secondary containment and resin regeneration will be completed automatically on a regular basis to maintain the resin at a high level of removal efficiency. The system will require a higher level of periodic O M compared to capping and ISS as effluent samples will likely need to be collected monthly and there is significant potential for shut-downs due to the number of different components (filter vessels, ion-exchange columns, slurry dryer, pH adjustment system, etc.) that are needed to keep the system operational. Most or all of these components will also need replacement over the 30-year design lifetime of the system.

4.2.4 Alternative D: Vertical Barrier H draulic Control, Pump-and-Treat, and MNA

The Vertical Barrier/Hydraulic Control, Pump-and-Treat, and MNA Alternative, which includes a pump-and-treat system pumping from wells both inside and downgradient of the slurry wall, would offer a high level of short- and long-term protection. The downgradient well field would remove impacted groundwater allowing for higher-efficiency natural attenuation downgradient of the capture zone while the well field inside the slurry wall would remove more highly-impacted material and reduce the potential for future releases if the slurry wall fails. This alternative would also result in the highest level of contaminant mass removal.

Construction/implementation of this corrective measure alternative would face similar construction/permitting hurdles as the Vertical Barrier/Hydraulic Control and Pump-and-Treat Alternatives in Sections 4.2.2 and 4.2.3, most significantly lead times on components and discharge permitting. Operation and maintenance for this remedy would also be similar to these alternatives with frequent influent/effluent sampling and component monitoring and maintenance, however, the treatment system could be contained in a single enclosure and have a

single set of components for treating extracted water from both capture areas. Because of the shared treatment system, the O M level of effort would likely not be significantly higher than that presented in Section 4.2.3 for the Pump-and-Treat Alternative (as opposed to an additive level of effort for the combined remedial alternatives).

5.0 SUMMARY AND NE T STEPS

This Addendum 2 supplements the ACM Report (Golder 2019) and replaces in full ACM Addendum 1 (Golder 2020). It reflects NIPSCO s enhanced closure strategy and ongoing discussions with IDEM in response to comments on the latest Closure Application, providing additional details regarding the remaining four potential groundwater corrective measures originally identified in those reports, and evaluating those corrective measures in accordance with the performance requirements identified in 40 CFR §257.96(c). As noted above, a summary of Golder s evaluation of the four retained groundwater corrective measure alternatives is provided in Table 6.

In addition to updating the ACM to reflect the most recent discussions with IDEM and the revision/submission of the Closure Application for IDEM for review and approval, NIPSCO continues to conduct activities in accordance with the expectations of the ACM and Selection of Remedy (SOR) processes, including the following:

- Preparation of bid documents (specifications and drawings) for closure of the MCU, which provide SOR-related information relative to cost and schedule for alternatives.
- Contractor procurement (including contractor pre-qualification, scheduling of site walks, scope of work question-and-answer, request for alternative approach(es), and establishment of a bid due date) to perform the source removal/capping phase of the corrective measures. This activity informs and refines cost and schedule aspects of the SOR alternatives evaluation process.
- Communications with vendors regarding water treatment technologies, equipment availability, and media costs/handling. This activity also informs and helps refine cost and schedule aspects of the SOR evaluation.

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Tables

Table 1: Applicable Groundwater Cleanup Standards
CCR Unit Schahfer MSRB, MCWB, and DA
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL (mg/L)	GWPS (mg/L)	IDEM RCG (mg/L)
Appendix III Constituents			
Boron	-	NA	4
Calcium	-	NA	-
Chloride	-	NA	-
Fluoride	4	4	0.8
pH	-	NA	-
Sulfate	-	NA	-
Total Dissolved Solids	-	NA	-
Appendix IV Constituents			
Antimony	0.006	0.006	0.006
Arsenic	0.01	0.078	0.01
Barium	2	2	2
Beryllium	0.004	0.004	0.004
Cadmium	0.005	0.005	0.005
Chromium	0.1	0.1	0.1
Cobalt[1]	0.006[2]	0.01	0.006
Fluoride	4	4	0.8
Lead[1]	0.015[2]	0.0007	0.015
Lithium[1]	0.04[2]	0.0082	0.04
Mercury	0.002	0.002	0.002
Molybdenum[1]	0.1[2]	0.036	0.1
Radium 226+228	5	5	-
Selenium	0.05	0.05	0.05
Thallium	0.002	0.002	0.002

Prepared by: DFS
Checked by: KMC
Reviewed by: MAH

Notes:
MCL= Environmental Protection Agency Maximum Contaminant Level
GWPS= Groundwater Protection Standard calculated August 23, 2018. Revision
mg/L= milligrams per liter
NA= not applicable; GWPS are calculated for Appendix IV constituents only
1) These four constituents do not have an established MCL. Prior to the Phase 1 Part 1 amendment, effective August 29, 2018, the GWPS was calculated based on background concentrations according to the CCR Final Rule.
2) The Phase 1 Part 1 amended health-based standard, effective August 29, 2018 pursuant to 40 CFR §257.95(h)(2)

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	CAMW04																		
				2016-07-12	2016-09-08	2018-11-05	2017-01-30		2017-03-31	2017-04-25	2017-06-28	2017-08-22	2017-10-04	2018-03-13	2018-03-14	2018-04-20		2018-10-25	2019-04-23	2019-11-07	2020-05-13	
				N	N	N	FD	N	N	N	N	N	N	FD	N	FD	N	N	N	N	FD	N
Appendix III Parameters																						
Boron		4	mg/L	0.48	1.4	2.4 Q	1.1	1	1.2	0.74	0.82	1.2	0.59			0.74	0.72	0.78	0.74	1.3	0.69	0.84
Calcium			mg/L	110	230	300 Q	270	240	230	220	200	200	140			140	140	210	130	290	115	112
Chloride			mg/L	8.6	27	69 Q	13	14	13	5.4	12	13	4.5			7.7 J	9.4	20	3.7	9.5	2	2
Fluoride	4	4	mg/L	0.92 J+	0.27	10 UQ	0.19 J	0.14 J	5 U	5 U	0.19 J	0.21 J	0.24 J	0.19 J	5 U	5 U	0.17 J+	0.26	0.19 J+	0.23	0.25	0.15
pH			SU	7.22	6.83	6.75		6.83	7.01	6.76	6.88	7.21	7.23		6.95		7.2	6.39	7	7.14		7.42
Sulfate			mg/l	140 J	460	188 Q	460	470	480	470	370	440	360			220	210	530	260	490	136	130
Total Dissolved Solids			mg/L	420	950	1400 Q	1000	1000	990	820	680	920	610			580 J	580	980	600	900	411	413
Appendix IV Parameters																						
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.00027 JQ	0.002 U	0.00057 J	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U	0.002 U			0.002 U	0.00095 J	0.00092 J	0.001 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0059	0.013	0.0052 Q	0.0059	0.0072	0.005 J	0.0059	0.012	0.012		0.004 J	0.005+			0.014	0.0025 J	0.0018 J	0.002	0.002
Barium	2	2	mg/L	0.051	0.027	0.11 Q	0.095	0.079	0.089	0.068	0.084	0.09		0.11	0.077			0.074	0.068	0.069	0.076	0.077
Beryllium	0.004	0.004	mg/L	0.00027 J	0.002 U	0.001 UQ	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.00048 J	0.00059 J	0.001 U	0.0002 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 UQ	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.00036 JQ	0.00058 J	0.0057 J	0.002 U	0.002 U	0.002 U	0.002 U		0.0011 J	0.0017 J			0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.001 U	0.00031 J	0.00064 JQ	0.0061	0.0058	0.0035	0.0049	0.003	0.0023		0.0028	0.0031			0.0026	0.0011	0.00043 J	0.001 U	0.001 U
Fluoride	4	4	mg/l	0.92 J	0.27	10 UQ	0.19 J	0.17 J	5 U	5 U	0.19 J	0.21 J	0.24 J	0.19 J	5 U	5 U	0.17 J	0.26	0.19 J+	0.23	0.25	0.15
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 UQ	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 L	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0018 J	0.006 U	0.003 UQ	0.0021 J	0.0022 J	0.0033 J	0.0035 J	0.0062 J	0.0052 J		0.009 U	0.008 U			0.0023 J	0.0045 J	0.0028 J	0.008 U	0.008 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 UQ	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 J	0.0002 UJ		0.0002 U	0.0002 U			0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.006 J	0.023	0.003 Q	0.007	0.008	0.008	0.010	0.02	0.004		0.0049 J	0.004			0.009	0.024	0.026	0.022	0.022
Radium 226 + 228	5		pCi/L	1 U	0.583	0.697 Q	0.804	0.515 U	0.362 U	0.376 U	0.364 U	0.352 U		1.35 J+	0.778 J+			0.473	0.591		1.7 U	1.52 U
Radium 226			pCi/L	1 U	0.198 U	0.316 UQ	0.301 U	0.242 U	0.129 U	0.117 U	0.119 U	0.118		0.177	0.0681			0.208	0.311 U		0.78 U	0.613 U
Radium-228			pCi/L	1 U	0.498 U	0.495 UQ	0.677 J+	0.515 U	0.362 U	0.376 U	0.364 U	0.352 U		1.17 J+	0.69 J+			0.462 U	0.425		0.924 U	1.35 U
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.00084 JQ	0.00077 J	0.0021 J	0.005 U	0.005 U	0.005 U	0.005 U		0.001 J	0.001 J			0.005 U	0.0013 J	0.0059	0.001 U	0.001 U
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 UQ	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																						
Dissolved Oxygen			mg/L	0.09	0.58	0.37		1.82	1.47	0.12	0.3	0.52	0.09		0.66		2.3	0.15	7.03	2.05		1.32
Oxidation Reduction Potential			millivolts	59.6	-24	-6.9		-91.7	14	-56.8	-46	-27	-105.8		-181.8		-81.2	-66.1	19	-10.7		-28.6
pH			SU	7.22	6.83	6.75		6.83	7.01	6.76	6.88	7.21	7.23		6.95		7.2	6.39	7	7.14		7.42
Specific Conductivity			uS/cm	695	1345	1681		1109	919	1137	911	1153	813		962		770	1311	549	866		681
Temperature			deg C	13	17.3	16.3		10.5	8.05	13.2	13.1	15.9	16.1		7.55		3.5	15.5	4.2	13.3		9.3
Turbidity			NTU	1.01	1.48	2.91		9.26	1.06	4.04	1.88	1.85	0.51		4.02		3.12	1.69	8.48	1.38		3.57

Notes
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-8 Screening Levels - 2021
Revision
MCL= Maximum Contaminant Leve
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uSiem = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
"U" = Indicates the result was not detected above the method criterion, limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.
"UJ" = Indicates the result was not detected above the MDL, the estimated RL is provided.
"Q" = Indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	CRMW07																
				2016-07-12	2016-09-08	2016-11-06	2017-01-10	2017-03-01	2017-04-26	2017-06-29	2017-08-23	2017-10-03		2018-03-15	2018-04-23	2018-06-26	2019-05-02	2019-11-08	2020-04-28	
				N	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	FD	N
Appendix III Parameters																				
Boron		4	mg/L	1.2	1	0.81	0.91	1	0.98	0.97	0.98	0.71	0.72		1.2	1.1	0.85	0.85	0.87	0.87
Calcium			mg/L	170	180	200	170	170	190	220	190	220	220		210	230	220	180	230	211
Chloride			mg/L	4.8	6.6	6.3	6	6.6	6.8	8.1	8.2 J	8.1	8.1		4.7 J	6.3	6.5	4.8	6.5	6.3
Fluoride	4	4	mg/L	0.72 J+	0.91 J	0.8 J	0.86 J	0.66 J	0.76 J	0.79 J	0.56 J	1.1 J	0.93 J	0.58 J	0.57 J	0.73	0.97	0.89	0.69	0.64
pH			SU	7.03	7.27	7.04	7.15	7.2	7.17	6.57	7.2		7.1	7.28	7.35	6.71	7.2	7.44		7.3
Sulfate			mg/l	310 J	330	390	320	290	310	360	380	460	450		450	520	500	480	490	390
Total Dissolved Solids			mg/L	720	830	840	750	750	810	970	910	970	1000		900	920	1100	940	840	846
Appendix IV Parameters																				
Antimony	0.006	0.006	mg/L	0.00035 J	0.00035 J	0.00035 J	0.00029 J	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.001 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0013 J	0.0016 J	0.0019 J	0.0028 J	0.002 U	0.0026 J	0.0015 J	0.0016 J			0.005 U		0.0012 J	0.0019 J	0.0011 J	0.001 U	0.001 U
Barium	2	2	mg/L	0.052	0.055	0.059	0.042	0.05	0.05	0.059	0.059			0.056		0.054	0.053	0.043	0.041	0.04
Beryllium	0.004	0.004	mg/L	0.00021 J	0.002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0013 J	0.00022 J			0.001 U		0.00047 J	0.001 U	0.001 U	0.0002 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.00017 J	0.00016 J	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.0021 J
Cobalt		0.006	mg/L	0.0056	0.0077	0.0055	0.0038	0.0044	0.0065	0.01	0.0095			0.006		0.01	0.0074	0.0045	0.0053	0.0064
Fluoride	4	4	mg/l	0.72 J	0.91 J	0.8 J	0.86 J	0.66 J	0.76 J	0.79 J	0.56 J	1.1 J	0.93 J	0.58 J	0.57 J	0.73	0.97	0.89	0.69	0.64
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0007 J			0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0034 J	0.036 U	0.036 U	0.0025 J	0.0031 J	0.0041 J	0.0027 J	0.0036 J			0.0024 J		0.0054 J	0.0041 J	0.0031 J	0.008 U	0.008 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ			0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.0084 J	0.0098 J	0.0095 J	0.01 J	0.01 U	0.0085 J	0.0081 J	0.007 J			0.0066 J		0.009 J	0.0057 J	0.0087 J	0.0073	0.0073
Radium 226 + 228	5		pCi/L	1.59	0.696	0.543	0.412 U	0.42 U	0.371 U	0.45	0.588			0.749 J+		0.823 J+	0.37 J		1.62	2.01 U
Radium 226			pCi/L	0.667 U	0.289	0.371	0.237 U	0.186	0.155	0.212 U	0.3			0.163		0.183 U	0.305 U		0.653 U	1.16 U
Radium-228			pCi/L	0.923	0.408	0.462 U	0.413 U	0.42 U	0.371 U	0.262 U	0.453 U			0.585 J+		0.365 U	0.37 U		1.07	0.864
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.003 T	0.003 T	0.005 U	0.008	0.0054	0.005			0.0028 T		0.0016 T	0.0045 T	0.0016 T	0.0017	0.0018
Thallium	0.002	0.002	mg/L	0.0001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.0024 J	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																				
Dissolved Oxygen			mg/L	0.6	1.31	0.59	0.52	0.51	1.96	1.02	0.84		0.49	0.6	0.52	2.64	0.81	0.38		0.34
Oxidation Reduction Potential			millivolts	111.2	64.2	-6.9	-71.3	66.3	76.9	291.1	8.5		99.4	-55	-98.7	-233.8	195.1	-131.8		116.2
pH			SU	7.03	7.27	7.04	7.15	7.2	7.17	6.57	7.2		7.1	7.28	7.35	6.71	7.2	7.44		7.3
Specific Conductivity			uS/cm	986	1072	1106	928	832	1121	1151	1157		1273	760	1060	1240	975	829		1223
Temperature			deg C	14.4	15.2	16.7	12.8	10.65	11.8	14.6	16.5		18	10	10	16.95	18.3	15.3		10.5
Turbidity			NTU	1.6	4.53	1.06	3.2	1.76	2.17	3.87	6.9		0.49	1.3	1.75	1.08	2.72	1.58		2.2

Notes
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-8 Screening Levels - 2021
Revision
MCL= Maximum Contaminant Leve
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
"U" = Indicates the result was not detected above the method criterion limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = Indicates the result is estimated.
"J+" = Indicates the result is estimated and may be biased low.
"J-" = Indicates the result is estimated and may be biased high.
"UJ" = Indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = Indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW07B					GAMW08													
				2018-09-06	2018-10-26	2019-05-02	2019-11-12	2020-04-28	2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-06-27	2017-06-29	2017-08-23	2017-10-04	2018-03-14	2018-04-23	2018-10-26	2019-05-02	2019-11-07	2020-04-28
				N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters																							
Boron		4	mg/L	20	22	28	15	11.1	5.5	3.9	2.2	3.4	1.8	3.2	2.9	2.2	3.7		3.4	1.8	1.4	2.5	3
Calcium			mg/L	370	430	380	400	370	310	290	300	260	270	310	340	270	290		380	220	250	280	309
Chloride			mg/L	10 UD	250	5.6	250	11.3	88	71	89	95	110	86	83	99	87		64	56	49	66	67
Fluoride	4	4	mg/L	10 UD	1.8	1.8	1.6	1.2	1.2 J-	1.2 J	0.78 J	0.87 J	0.94 J	0.52 J	1.3 J	2 J	0.68 J	1.2 J	1.3 J-	1.6	2.2	1.8	1.1 J-
pH			SU	8.39	6.78	7.58	7.13	7.73	6.92	7.03	6.85	7.02	7.09	6.83	7	7.27	6.89	7.41	7.42	6.99	7.37	7.5	7.35
Sulfate			mg/l	10 UD	1600	1500	1400	1260	770 J	690	683	610	830	770	800	690	670		800	460	640	670	710
Total Dissolved Solids			mg/L	2200	2600	920	2300	2_40	1500	1500	1800	1700	1400	1700	2000	1400	1500		1700	1100	1300	1300	1550
Appendix IV Parameters																							
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.00078 J	0.00065 J	0.0014 J	0.00041 J	0.00048 J	0.002 U	0.00052 J	0.00075 J		0.002 U		0.00082 J	0.00076 J	0.00077 J	0.001 U
Arsenic	0.01	0.01	mg/L	0.0028 J	0.0025 J	0.0019 J	0.0017 J	0.0023	0.0018 J	0.0019 J	0.0016 J	0.0027 J	0.0026 J	0.0021 J	0.0017 J	0.0023 J		0.005 U		0.0011 J	0.0015 J	0.0016 J	0.0012
Barium	2	2	mg/L	0.072	0.058	0.053	0.048	0.044	0.068	0.065	0.068	0.09	0.056	0.064	0.074	0.077		0.060	0.069	0.052	0.058	0.060	0.061
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.00017 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.0004 J	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	7.4E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.00037 J	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.00029 J	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.00074 J	0.001 U	0.001 U	0.001 U	0.001 U	0.006	0.004	0.008	0.007	0.05	0.037	0.047	0.02		0.022	0.027	0.011	0.0078	0.011	0.022
Fluoride	4	4	mg/l	10 U	1.8	1.8	1.6	1.2	1.2	1.2 J	0.78 J	0.87 J	0.94 J	0.52 J	1.3 J	2 J	0.68 J	1.2 J	1.3 J	1.6	2.2	1.8	1.1 J
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0043 J	0.0045 J	0.004 J	0.0035 J	0.003 U	0.0086	0.011	0.009	0.0088	0.0063	0.012	0.011	0.012		0.0098	0.009	0.011	0.015	0.0095	0.0057
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.015	0.017	0.029	0.026	0.026	0.004	0.006	0.004	0.02	0.019	0.029	0.049	0.083		0.056	0.058	0.059	0.09	0.069	0.048
Radium 226 + 228	5		pCi/L	3.63	2.62 J-	2.31		1.92 U	1.07	1.08	1.09	0.531	0.777	0.632	1.11	0.762		1.13 J+	0.99	1.1+	0.473		1.25 U
Radium 226			pCi/L	1.86	1.58 U	2.17		0.889 U	0.501 U	0.486	0.557	0.375	0.388	0.383	0.613 U	0.501		0.267	0.497	0.582 U	0.312 U		0.569 U
Radium 228			pCi/L	1.47	1.04	1.14		1.07	1 U	0.605	0.533	0.43 U	0.423 U	0.365 U	0.469	0.341 U		0.865 J+	0.552	0.423	0.456 U		0.689 U
Selenium	0.05	0.05	mg/l	0.0012 J	0.005 U	0.005 U	0.005 U	0.001 U	0.005 U	0.0045	0.0033 J	0.0014 J	0.0032 J	0.01	0.0058	0.0081		0.004	0.022	0.0021 J	0.016	0.0036 J	0.0062
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.00045 J	0.001 U	0.001 U
Field Parameters																							
Dissolved Oxygen			mg/L	0.83	0.67	0.19	0.2	0.1	1.9	0.38	1.52	1.27	0.95	0.63	1.96	3.93	0.21	3.97	5.09	0.21	0.44	4.2	0.34
Oxidation Reduction Potential			millivolts	-147.6	-230.2	34.9	-196.7	-128.6	156.4	94.6	-8	98.4	49.9	60.4	242.6	61.8	-25.9	110.1	-106.4	22.7	62.2	44.1	92.5
pH			SU	8.39	6.78	7.58	7.13	7.73	6.92	7.03	6.85	7.02	7.09	6.83	7	7.27	6.89	7.41	7.42	6.99	7.37	7.5	7.35
Specific Conductivity			uS/cm	3178	3237	2357	1696	2722	1905	1807	1694	1517	1494	2088	1824	1713	1840	1121	1732	1440	1102	1322	2008
Temperature			deg C	15.03	13.86	12.4	12.9	12.7	15.5	18.78	17.75	12.2	10.06	11.1	15.8	18.5	18.3	9.6	10.2	17.2	11	10.34	10.5
Turbidity			NTU	1.48	3.01	0.86	1.11	3.48	2.3	3.22	0.58	1.26	1.58	5.1	2.41	0.68	1.38	1.11	1.54	1.4	0.81	0.31	2.5

Notes:
IDEM RCGs: Indiana Department of Environmental Management Remediation Closure Guidance Table 4-8 Screening Levels - 2021 Revision

MCL = Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = indicates the result is estimated.
"J-" = indicates the result is estimated and may be biased low.
"J+" = indicates the result is estimated and may be biased high.

"UJ" = indicates the result was not detected above the MDL; the estimated RL is provided.

"D" = indicates a result was identified as an outlier and removed from the data set.

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	CAMW05S							
				2018-09-07		2018-10-26		2019-05-03	2019-11-07	2020-04-2	
				FD	N	FD	N	N	N	FD	N
Appendix III Parameters											
Boron		4	mg/L		18		15	14	13		20.4
Calcium			mg/L		330		320	320	340		325
Chloride			mg/L		240		180	100	180		220
Fluoride	4	4	mg/L		1.6 J		1.5	1.8	1.7		2.5 J-
pH			SU		7.7		7.45	7.57	7.85		7.89
Sulfate			mg/l		1500		1500	1400	1300		1280
Total Dissolved Solids			mg/L		1900 J+		2300	2300	2200		2560
Appendix IV Parameters											
Antimony	0.006	0.006	mg/L		0.002 U		0.002 U	0.002 U	0.002 U		0.001 U
Arsenic	0.01	0.01	mg/L		0.005 U		0.005 U	0.005 U	0.005 U		0.001 U
Barium	2	2	mg/L		0.042		0.03	0.026	0.023		0.028
Beryllium	0.004	0.004	mg/L		0.001 U		0.001 U	0.001 U	0.001 U		0.0002 U
Cadmium	0.005	0.005	mg/L		0.001 U		0.001 U	0.001 U	0.001 U		0.0002 U
Chromium	0.1	0.1	mg/L		0.007 U		0.007 U	0.007 U	0.007 U		0.007 U
Cobalt		0.006	mg/L		0.00668 J		0.001 U	0.001 U	0.001 U		0.001 U
Fluoride	4	4	mg/l		1.6 J		1.5	1.8	1.7		1.5 J
Lead	0.015	0.015	mg/L		0.001 U		0.001 U	0.001 U	0.001 U		0.001 U
Lithium		0.04	mg/L		0.0059 J		0.0073 J	0.0063 J	0.0059 J		0.003 U
Mercury	0.002	0.002	mg/L		0.0002 U		0.0002 U	0.0002 U	0.0002 U		0.0002 U
Molybdenum		0.1	mg/L		0.037		0.039	0.057	0.046		0.05
Radium-226 + 228	5		pCi/L		1.67 J+		1.02 J+	0.784			1.67 U
Radium-226			pCi/l		1.09 J+		0.596 J+	0.498			0.709 U
Radium-228			pCi/L		0.579		0.454 U	0.518 U			0.857 U
Selenium	0.05	0.05	mg/L		0.001 U		0.005 U	0.005 U	0.005 U		0.001 U
Thallium	0.002	0.002	mg/L		0.001 U		0.001 U	0.001 U	0.001 U		0.001 U
Field Parameters											
Dissolved Oxygen			mg/L		0.42		0.12	0.33	2.81		0.12
Oxidation Reduction Potential			millivolts		-185.5		-97	79	-67		-142.2
pH			SU		7.7		7.45	7.57	7.85		7.89
Specific Conductivity			uS/cm		2538		2375	2290	1896		3391
Temperature			deg C		14.6		14.5	12.8	8.05		13
Turbidity			NTU		3.4		1.63	1.72	0.86		9.51

Notes:
IDEM RCGs: Indiana Department of Environmental Management
Remediation Closure Guidance Table A-3 Screening Levels - 2021
Revision

MCL – Maximum Contaminant Level
mg/L = milligrams per liter
SU – standard units
pCi/L – picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = indicates the result is estimated.
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"UJ" = indicates the result was not detected above the MDL; the estimated RL is provided.
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GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW05																	
				2016-07-13	2016-09-08	2016-11-05	2017-01-10	2017-03-01		2017-04-25		2017-06-28	2017-08-23	2017-10-03	2018-03-14	2018-04-23	2018-10-25	2019-05-02		2019-11-07	2020-04-29
				N	N	N	N	FD	N	FD	N	N	N	N	N	N	N	FD	N	N	N
Appendix III Parameters																					
Boron		4	mg/L	5.7	4.7	7.3	5.2	5.7	6.0	5.8	6.1	4.8	7.9	7.3		4.8	6.3	6	6	2.7	3.3
Calcium			mg/L	220	240	210	210	200	200	220	240	270	280	220		220	220	200	200	150	170
Chloride			mg/L	63	55	58	58	58	75	73	71	67	63	59	54		56	52	46	36	34.3
Fluoride	4	4	mg/L	0.15 J-	10 U	10 U	0.22 J	0.13 J	0.14 J	0.10 J	0.13 J	0.18 J	0.10	0.21 J	5 U	0.20 J-	0.28	0.27	0.27	0.33	0.3 J-
pH			SU	7.27	7.25	7.12	6.68		7.44		7.15	7.25	7.31	7.3	7.28	6.87	6.88		7.1	7.05	7.15
Sulfate			mg/l	610 J	570	360	500	410	430	460	460	600	740	540		510	510 J	530	530	380	390
Total Dissolved Solids			mg/L	1500	1100	880	980	1000	950	1000	960	1300	1400	1,100		950	1100	970	980	770	772
Appendix IV Parameters																					
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 J		0.002 U	0.002 U	0.002 U	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0015 J	0.0013 J	0.00976 J	0.0021 J	0.005 U	0.005 U	0.0029 J	0.0029 J	0.003 J	0.0027 J		0.005 U		0.005 U	0.005 U	0.005 U	0.005 U	0.001 U
Barium	2	2	mg/L	0.059	0.048	0.039	0.039	0.035	0.037	0.039	0.042	0.047	0.054		0.041	0.039	0.039	0.041	0.041	0.036	0.032
Beryllium	0.004	0.004	mg/L	0.00052 J	0.002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.00036 J	0.002 U	0.001 U	0.001 U		0.001 UJ		0.00052 J	0.00058 J	0.00052 J	0.00049 J	0.00039
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.00033 J	0.001 U	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.0036	0.002 U	0.00069 J	0.0015 J	0.002 U	0.002 U	0.002 U	0.002 U	0.0011 J	0.0015 J		0.0016 J		0.002 U	0.0012 J	0.0012 J	0.002 U	0.001 U
Cobalt		0.006	mg/L	0.001 U	0.00018 J	0.0002 J	0.0002 J	0.001 U	0.001 U	0.00029 J	0.00025 J	0.001 U	0.001 U		0.001 U		0.00038 J	0.00049 J	0.00055 J	0.00035 J	0.001 U
Fluoride	4	4	mg/l	0.15 J	10 U	10 U	0.22 J	0.13 J	0.14 J	0.10 J	0.13 J	0.18 J	0.10	0.21 J	5 U	0.20 J	0.28	0.27	0.27	0.33	0.3 J
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0019 J	0.036 U	0.003 U	0.0016 J	0.0011 J	0.0022 J	0.003 U	0.036 U	0.0047 J	0.0013 J		0.008 U		0.008 U	0.008 U	0.008 U	0.008 U	0.003 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.004	0.012	0.004	0.003	0.003	0.003	0.003	0.002	0.003	0.002		0.025	0.006	0.04	0.043	0.043	0.035	0.012
Radium 226 + 228	5		pCi/L	1.5	0.588	0.477 U	0.467 U	0.55	0.459	0.593	0.414	0.707	0.803		1.45 J+	0.396	0.679	0.505	0.427 U		1.47 U
Radium 226			pCi/L	0.906 U	0.291	0.307 U	0.247	0.134	0.156	0.104	0.285	0.255 U	0.357		0.188	0.291	0.446	0.33	0.355 U		0.606 U
Radium-228			pCi/L	0.994	0.349 U	0.472 U	0.467 U	0.427 U	0.432 U	0.393	0.36 U	0.452	0.446		1.26 J+	-0.108	0.361 U	0.428 U	0.427 U		0.277 U
Selenium	0.05	0.05	mg/l	0.011	0.0091	0.0049 J	0.011	0.014	0.014	0.017	0.02	0.013	0.027		0.0082	0.017	0.0098	0.012	0.012	0.0077	0.0026
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																					
Dissolved Oxygen			mg/L	2.09	6.69	1.98	6.1		3.41		3.92	5.27	3.24	5.98	6.71	5.43	0.22		5.02	5.04	3.14
Oxidation Reduction Potential			millivolts	-1.4	75.7	270	230		98.5		154.6	280.8	58.9	138.5	-110.3	-90.8	-48.8		53.6	-25.7	44
pH			SU	7.27	7.25	7.12	6.68		7.44		7.15	7.25	7.31	7.3	7.28	6.87	6.88		7.1	7.05	7.15
Specific Conductivity			uS/cm	1671	736	1110	822		1041		1209	702	1542	1331	600	1155	1274		988	685	774
Temperature			deg C	14.4	18.4	16.9	11.8		10.75		11.9	14.7	17.2	18.2	13.2	10.9	17.9		11.4	15.9	10.3
Turbidity			NTU	1.93	3.03	7.15	1.84		3.12		1.88	5.01	0.91	0.36	0.82	2.94	2.47		1.41	1.55	2.37

Notes:
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-6 Screening Levels - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = indicates the result is estimated.
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"J+" = indicates the result is estimated and may be biased high.

"UJ" = indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = Indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	CAMW03B																	
				2016-07-13		2016-05-26	2016-12-09	2017-01-10	2017-03-01	2017-04-26	2017-08-28	2017-08-23		2017-10-05	2018-03-14	2018-04-23	2018-09-06	2018-10-26	2019-05-08		2019-11-07	2020-04-27
				FD	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	FD	N	N	N
Appendix III Parameters																						
Boron		4	mg/L	24	25	25	19	11	11	11	12	16	19	19		14	12	12	14	14	8	6.1
Calcium			mg/L	280	280	270	190	200	170	170	180	160	190	150		160	150	160	150	150	150	140
Chloride			mg/L	210	180	190	130	110	120	130	150	170	160	140		150	130	150	240	140	110	110
Fluoride	4	4	mg/L	0.68 J+	0.62 J+	0.67 J	0.68 J	0.1 J	1.8 J	1.2 J	1.4 J	1.2 J	0.87 J	1.5 J	1.4 J	1.6 J	1.8 J	1.6	2.6	1.6	1.5	1.3
pH			SU		7.08	7.15	5.96	7.36	7.44	7.29	7.36		7.46	7.36	7.56	7.43	7.32	7.46		7.46	7.56	7.65
Sulfate			mg/l	670 J	1000 J	980	740	620 J+	550	570	610	630	650	650		430	570	580	610	570	440	387
Total Dissolved Solids			mg/L	2100	2000	2100	1700	1330	1200	1200	1500	1500	1500	1300		990	1300	1200	1200	1200	990	906
Appendix IV Parameters																						
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.0011 U
Arsenic	0.01	0.01	mg/L	0.0024 J	0.0026 J	0.003 J	0.0014 J	0.0027 J	0.005 U	0.004 J	0.004 J	0.0031 J	0.0031 J		0.005+	0.0054	0.0044 J	0.004 J	0.0052	0.0057	0.0042 J	0.0049
Barium	2	2	mg/L	0.069	0.071	0.076	0.062	0.048	0.04	0.046	0.065	0.062	0.068		0.045	0.04	0.049	0.047	0.042	0.041	0.028	0.034
Beryllium	0.004	0.004	mg/L	0.00012 J	9.1E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.00027 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/l	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U
Cobalt		0.006	mg/L	0.001 U	0.001 U	0.00069 J	0.00026 J	0.00045 J	0.001 U	0.00028 J	0.00045 J	0.00041 J	0.00041 J		0.001 U		0.00058 J	0.00028 J	0.00322 J	0.00025 J	0.001 U	0.001 U
Fluoride	4	4	mg/l	0.67 J	0.65 J	0.67 J	0.68 J	0.1 J	1.5 J	1.2 J	1.4 J	1.3 J	0.87 J	1.5 J	1.4 J	1.6 J	1.8 J	1.6	1.6	1.6	1.5	1.3
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.00017 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0055 J	0.0065 J	0.006 U	0.006 U	0.0046 J	0.0045 J	0.0058 J	0.0054 J	0.0047 J	0.0042 J		0.0051 J		0.0037 J	0.0052 J	0.0053 J	0.0052 J	0.0033 J	0.0016 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 J	0.0002 U	0.0002 U	0.0002 J	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 J	0.0002 U
Molybdenum		0.1	mg/L	0.01 U	0.01 U	0.01 U	0.0097 J	0.003	0.005	0.005	0.01 U	0.0094 J	0.01		0.014	0.022	0.01	0.01	0.012	0.012	0.0096 J	0.013
Radium 226 + 228	5		pCi/L	1.42	1.86	1.65	1.14	0.453	1.09	0.774	1.85	1.01	1.27		1.18 J+	0.868	1.04	1.24 J+	1.03	1.01		1.25 U
Radium 226			pCi/L	0.809 U	0.952 U	0.902	0.579	0.176	0.585	0.316	0.781 U	0.585	0.706		0.482	0.301	0.653	0.69 U	0.585	0.449		0.556 U
Radium-228			pCi/L	1 U	0.913	0.743	0.559	0.42 U	0.538	0.458	1.07	0.421	0.563		0.699 J+	0.567	0.338	0.546	0.491 U	0.584		0.838
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.005 U	0.005 U	0.002 U	0.005 U	0.0014 J	0.001 U	0.0015 J	0.0016 J		0.005 U		0.002 U	0.0019 J	0.005 U	0.005 U	0.001+ U	0.001 U
Thallium	0.002	0.002	mg/L	0.0035 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.0002 J	0.001 U	0.001 U
Field Parameters																						
Dissolved Oxygen			mg/L		0.44	1.06	3.43	0.38	0.44	0.51	0.71		0.57	0.45	0.1	0.04	0.61	0.28		0.04	0.35	0.17
Oxidation Reduction Potential			millivolts		-67.7	97.3	-76.4	-100.1	-80.6	-102.6	68.2		19.7	-46.8	-121.6	-136.6	-209.5	-101.1		-16.8	-141.8	-130
pH			SU		7.08	7.15	5.96	7.36	7.44	7.29	7.36		7.46	7.36	7.56	7.43	7.32	7.46		7.46	7.56	7.65
Specific Conductivity			uS/cm		2356	2435	2088	1559	1352	1592	1561		1922	1722	1053	1391	1553	1693		1165	9.24	1418
Temperature			deg C		14.1	14.7	15.1	13.6	13.45	14.5	14.8		15.5	15	14	14.4	15.1	16		14.2	14.4	13.3
Turbidity			NTU		3.48	4.29	2.17	0.99	0.58	1.88	1.80		2.91	1.96	4.18	0.17	2.05	1.39		1.7	3.36	4.8

Notes
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-8 Screening Levels - 2021
Revision
MCL= Maximum Contaminant Level
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uS/cm = microSiemens per centimeter
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NTU = Nephelometric Turbidity Units
"U" = indicates the result was not detected above the method criterion limit (MDL) for the sample; the quantitation limit (RL) is provided
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"J-" = indicates the result is estimated and may be biased high.
"UJ" = indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	CAMW15														
				2016-07-13	2016-09-08		2016-11-05	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-13	2018-03-15	2018-04-24	2018-10-26	2019-05-06	2019-11-08	2020-04-27
				N	FD	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters																			
Boron		4	mg/L	0.76	0.45 J	1	1.1	0.6	0.44	0.45	0.87	0.91	0.66		0.72	0.79	0.71	0.75	0.68
Calcium			mg/L	130	130	120	100	82	91	95	150	150	77		170	120	140	100	120
Chloride			mg/L	28	31	31	27	28	27	27	27	25	14		24	21	22	28	25.2
Fluoride	4	4	mg/L	1.2 J+	0.85 J	0.89 J	0.74 J	0.8 J	0.77 J	0.74 J	0.82 J	0.82 J	0.88 J	0.67 J	0.76 J	0.69	0.92	0.75	0.9
pH			SU	6.83		6.98	6.83	6.86	6.99	6.76	6.61	6.96	6.88	6.95	6.89	5.2	7.1	7.34	7.34
Sulfate			mg/l	160 J	260	250	150	240	140	160	330	330	260		110	240	380	260	227
Total Dissolved Solids			mg/L	570	660	630	520	400	400	420	730	750	650		790	5800 D	740	640	572
Appendix IV Parameters																			
Antimony	0.006	0.006	mg/L	0.002 U	0.00041 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.055	0.072	0.069	0.078	0.075	0.054	0.062	0.059	0.066			0.058		0.091	0.061	0.075	0.061
Barium	2	2	mg/L	0.044	0.053	0.053	0.039	0.032	0.031	0.034	0.054	0.048			0.047		0.049	0.047	0.037	0.038
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.0012 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.0012 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.002 J	0.00027 J	0.00078 J	0.00059 J	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.0019	0.0022	0.0022	0.0021	0.0019	0.0018	0.0022	0.0029	0.0027			0.0025		0.0023	0.0035	0.0017	0.0018
Fluoride	4	4	mg/l	1.2 J	0.85 J	0.89 J	0.74 J	0.8 J	0.77 J	0.74 J	0.82 J	0.82 J	0.88 J	0.67 J	0.76 J	0.69	0.92	0.75	0.9
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0053 J	0.036 U	0.008 U	0.009 U	0.004 J	0.0054 J	0.004 J	0.0058 J	0.005 J			0.0023 J		0.0054 J	0.0033 J	0.0027 J	0.005 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0003 JB			0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.002	0.002	0.002	0.002	0.002	0.002	0.002	0.002	0.002			0.002		0.002	0.002	0.002	0.001
Radium 226 + 228	5		pCi/L	1 U	0.479	0.513	0.546 U	0.555 J+	0.339 U	0.463 U	0.335	0.342 U			0.657 J+		0.858 J+	0.476 U		1.72 U
Radium 226			pCi/l	1 U	0.282	0.145	0.337 U	0.38	0.177 U	0.1	0.0965 U	0.161			0.681 J		0.597 U	0.28 U		1.02 U
Radium-228			pCi/L	1 U	0.397 U	0.382 U	0.546 U	0.401 U	0.339 U	0.463 U	0.278 U	0.342 U			0.376 J+		0.407 U	0.476 U		0.695 U
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U			0.005 U		0.005 U	0.005 U	0.005 U	0.001 U
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																				
Dissolved Oxygen			mg/L	0.43		0.48	0.14	0.22	0.18	0.19	1	0.32	0.39	0.05	0.02	1.67	0.15	0.12	0.09
Oxidation Reduction Potential			millivolts	-79.2		-60.1	-111	-114.3	-124.5	-108.4	-46.9	-43.7	-358	-568	-99.1	-254.7	-27.6	-103	-103.9
pH			SU	6.83		6.98	6.83	6.86	6.99	6.76	6.61	6.96	6.88	6.95	6.89	5.2	7.1	7.34	7.34
Specific Conductivity			uS/cm	779		909	733	594	584	674	9.32	1004	901	581	933	855	790	598	950
Temperature			deg C	15.3		23.3	19.9	14.6	12.1	11.6	14.6	16.6	13.5	10.3	10.6	17.1	9.3	15.8	11.5
Turbidity			NTU	4.48		8.06	3.91	3.98	4.4	4.92	5.2	3.1	1.57	3.08	1.29	3.1	4.9	6.9	0.51

Notes:
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-8 Screening Levels - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = indicates the result was not detected above the method criterion limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = indicates the result is estimated.
"J+" = indicates the result is estimated and may be biased low.
"J-" = indicates the result is estimated and may be biased high.

"non" = indicates the result was not detected above the MDL; the estimated RL is provided.
"D" = indicates a result was identified as an outlier and removed from the data set.

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW15B																		
				2016-07-13	2016-09-08	2016-11-05	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-03	2018-03-15	2018-04-24	2018-09-06		2018-10-26	2019-05-08		2019-11-08		2020-04-27
				N	N	N	N	N	N	N	N	N	N	N	N	FD	N	N	N	FD	N	N
Appendix III Parameters																						
Boron		4	mg/L	1.1	1.2	2	1.7	1.3	1.6	1.5	2.1	2.1		4.4	4.1		4.9	10		9.2	7.9
Calcium			mg/L	160	160	160	180	160	170	190	170	73		230	200		210	260		280	270
Chloride			mg/L	52	55	62	81	64	65	72	64	64		87	89		90	120		80	104
Fluoride	4	4	mg/L	0.69 J+	0.62 J	0.76 J	0.74 J	0.77 J	0.78 J	0.72 J	0.82 J	0.65 J	0.68 J	0.79 J	0.6 J		0.6	0.84 J+		0.89	0.84
pH			SU	7.81	7.49	7.04	7.52	7.48	7.11	7.26	7.37	7.42	7.45	7.36	7.3		6.74	7.43		7.57	7.56
Sulfate			mg/l	980 J	960	840	900	890	930	930	920	500		790	720		770	1300		910	912
Total Dissolved Solids			mg/L	830	800	840	1000	890	980	1200	1100	1100		1400	1400		1400	2100		1600	1720
Appendix IV Parameters																						
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U		0.002 U	0.002 U		0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.003 J	0.0051 J	0.0014 J	0.0022 J	0.0011 J	0.00093 J	0.00084 J	0.00081 J		0.005 U		0.005 U		0.005 U	0.00098 J		0.005 U	0.001 U
Barium	2	2	mg/L	0.054	0.053	0.059	0.056	0.051	0.062	0.064	0.069		0.068		0.07		0.064	0.081		0.064	0.064
Beryllium	0.004	0.004	mg/L	7.6E-05 J	0.002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.002 U		0.001 U		0.001 U	0.001 U		0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.002 U		0.001 U		0.001 U	0.001 U		0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.00065 J	0.002 U	0.002 U	0.00053 J	0.00034 J	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U		0.002 U	0.002 U		0.002 U	0.002 U
Cobalt		0.006	mg/L	0.001 U	0.002 U	0.001 U	0.001 U	0.00016 J	0.001 U	0.001 U	0.001 U		0.002 U		0.001 U		0.001 U	0.001 U		0.001 U	0.001 U
Fluoride	4	4	mg/l	0.69 J	0.62 J	0.76 J	0.74 J	0.77 J	0.78 J	0.72 J	0.82 J	0.65 J		0.79 J	0.6 J		0.6	0.84 J+		0.89	0.84
Lead	0.015	0.015	mg/L	0.001 U	0.002 U	0.00023 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.002 U		0.001 U		0.001 U	0.001 U		0.001 U	0.001 U
Lithium		0.04	mg/L	0.0038 J	0.036 U	0.003 U	0.0077 J	0.0023 J	0.0062	0.0063	0.0077 J		0.027 J		0.006		0.0066	0.012		0.0062	0.0086
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U		0.0002 J		0.0002 U	0.0002 U		0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.011	0.013	0.01	0.012	0.011	0.014	0.014	0.012		0.012		0.01		0.011	0.012		0.01	0.012
Radium 226 + 228	5		pCi/L	1.25	0.534	0.81	1.14 J+	0.876	0.687	0.789	0.872		1.69 J+		1.31		1.51 J+	1.61			1.63 U
Radium 226			pCi/L	0.807 U	0.412	0.361 U	0.785	0.491	0.443	0.493 U	0.517		0.752		0.711		0.837 U	1.03			0.668 U
Radium-228			pCi/L	1 U	0.389 U	0.469 U	0.363 U	0.435	0.378 U	0.329 U	0.363 U		0.94 J+		0.803		0.678	0.544			0.975 U
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U		0.005 U		0.0017 J		0.005 U	0.005 U		0.005 U	0.001 U
Thallium	0.002	0.002	mg/L	0.001 U	0.002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.002 U		0.001 U		0.001 U	0.00083 J		0.001 U	0.001 U
Field Parameters																						
Dissolved Oxygen			mg/L	0.22	0.91	0.56	0.22	0.48	0.3	0.43	0.54	0.23	0.09	0.04	0.29		2.66	0.23		0.16	0.16
Oxidation Reduction Potential			millivolts	-129.2	-21.6	-94.6	-152.6	-81.7	-49.6	-21.9	-36.5	-42.6	-64	-103.4	-92.2		-26.1	46.3		-189.2	-98.1
pH			SU	7.81	7.49	7.04	7.52	7.48	7.11	7.26	7.37	7.42	7.45	7.36	7.3		6.74	7.43		7.57	7.56
Specific Conductivity			uS/cm	834	1049	1060	1237	940	1096	1099	1110	1295	1255	1612	2757		2889	1798		1384	2359
Temperature			deg C	17.71	15.9	16.1	13.8	13.6	13	13.8	14.2	14.5	13.3	13	14.13		13.6	9.1		13.8	13.9
Turbidity			NTU	1.93	1.58	1.46	3.6	2.23	8.65	3.16	1.78	0.4	4.59	4.85	3.59		1.35	3.56		1.49	4.3

Notes:
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-6 Screening Levels - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units.

"U" = Indicates the result was not detected above the method criterion limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"UJ" = Indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = Indicates a result was identified as an outlier and removed from the data set.

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GANW16																	
				2016-07-13	2016-09-08	2016-11-06	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-15	2018-04-24	2018-10-29		2019-05-08	2019-11-08		2020-04-13
				N	N	N	N	N	N	N	N	N	N	N	N	FD	N	N	FD	N	N
Appendix III Parameters																					
Boron		4	mg/L	1.1	1.8	1.6	1.2	0.85	1.3	1	1.4	1.1		1.3	1.4	1.4	1.6		1.8	1.1	
Calcium			mg/L	230	160	230	120	160	210	220	240	57		220	160	160	210		210	202	
Chloride			mg/L	53	37	50	28	24	25	29	31	42		58	36	36	26		59	25.9	
Fluoride	4	4	mg/L	1.4 J+	1.6 J	1.3 J	1.5	1.3 J	1.3 J	1.2 J	1.3 J	1.5 J	1 J	1.2 J	1.1	1.1	0.99		1.1	0.88	
pH			SU	7.92	7.13	7.48	7.5	7.58	7.17	7.36	7.36	7.62	7.41	7.67			7.28		7.8	7.79	
Sulfate			mg/l	530	400	500	470	300	530	580	680	520		530	340		350		530	757	
Total Dissolved Solids			mg/L	1100	810	790	570	570	930	1000	1100	950		1100	740		730		1100	1290	
Appendix IV Parameters																					
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.00028 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U		0.002 U	0.001 U	
Arsenic	0.01	0.01	mg/L	0.011	0.0077	0.012	0.0064	0.0078	0.006	0.006	0.0096		0.0021 J	0.0095	0.01	0.0069	0.005		0.0092	0.009	
Barium	2	2	mg/L	0.049	0.042	0.035	0.024	0.029	0.043	0.044	0.054		0.057	0.045	0.035	0.035	0.044		0.034	0.046	
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U		0.001 U	0.0002 U	
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U		0.001 U	0.0002 U	
Chromium	0.1	0.1	mg/L	0.00065 J	0.002 U	0.002 U	0.0031	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U		0.002 U	0.002 U	
Cobalt		0.006	mg/L	0.001 U	0.00068 J	0.00051 J	0.00046 J	0.00055 J	0.00052 J	0.00094 J	0.001 U		0.001 U		0.00059 J	0.00061 J	0.00066 J		0.00061 J	0.0012	
Fluoride	4	4	mg/l	1.4 J	1.6 J	1.3 J	1.5	1.3 J	1.3 J	1.2 J	1.3 J	1.5 J	1 J	1.2 J	1.1	1.1	0.99		1.1	0.88	
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	
Lithium		0.04	mg/L	0.00043 J	0.039 U	0.039 U	0.00623 J	0.003 U	0.008 U	0.008 U	0.008 U		0.008 U		0.008 U	0.008 U	0.008 U		0.008 U	0.008 U	
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U		0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U	
Molybdenum		0.1	mg/L	0.024	0.036	0.043	0.044	0.03	0.027	0.023	0.024		0.027	0.021	0.035	0.031	0.027		0.028	0.022	
Radium 226 + 228	5		pCi/L	1.68	0.543	0.527 U	0.626 U	0.648	0.392 U	0.339 U	0.429		0.852 J+	0.29	0.863 J+	1.32 J+	0.685 U			1.69 J	
Radium 226			pCi/L	0.532 U	0.249	0.363 U	0.256 U	0.120 U	0.091	0.106 U	0.216		0.1	0.0822	0.214 U	0.238 U	0.227 U			0.641 U	
Radium-228			pCi/L	1.14	0.335 U	0.527 U	0.626 U	0.528	0.392 U	0.339 U	0.322 U		0.752 J+	0.208	0.648 J+	1.04 J+	0.685 U			1.05 J	
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.0005 J	0.00053 J	0.003 U	0.0012 J	0.005 U	0.005 U		0.005 U		0.005 U	0.005 U	0.005 U		0.0015 J	0.001 U	
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	
Field Parameters																					
Dissolved Oxygen			mg/L	0.16	0.27	0.46	0.31	0.36	0.14	0.5	0.14	0.05	0.22	0.22		1.27	0.29		4.02	0.19	
Oxidation Reduction Potential			millivolts	-13.06	71.6	-124.8	-78.8	-126.9	-63.6	-114.2	9.5	-138.4	-55.8	-106.5		-216.8	8		-2	-124.8	
pH			SU	7.92	7.13	7.48	7.5	7.58	7.17	7.36	7.36	7.62	7.41	7.67		7.28	7.46		7.8	7.79	
Specific Conductivity			uS/cm	1331	1112	807	751	921	1257	1123	1406	1254	1029	1239		1046	1001		2014	1880	
Temperature			deg C	15.02	16.8	18.15	12.1	9.72	13.6	15.41	18	17.3	8.71	9.3		17.81	10.5		27.52	10.3	
Turbidity			NTU	8.80	2.16	1.68	3.16	1.14	8.05	4.83	2.45	4.05	4.62	12.51		3.64	1.65		4.68	8.11	

Notes:
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-6 Screening Levels - 2021
Revision
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
"U" = indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = indicates the result is estimated.
"J+" = indicates the result is estimated and may be biased low.
"J-" = Indicates the result is estimated and may be biased high.
"FD" = indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = Indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GMW183																
				2016-07-13	2016-09-08	2016-11-09		2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-15	2018-04-24	2018-08-07	2018-10-29	2019-05-06	2018-11-08	2020-04-14
				N	N	FD	N	N	N	N	N	N	N	N	N	N	N	N	FD	N	N
Appendix III Parameters																					
Boron		4	mg/L	1.6	1.6	1.4	1.4	1.4	1.4	1.1	1.4	1.5	1.9		1.1	1.0	0.7	1.2	1.1	1.0	0.2
Calcium			mg/L	230	190	190	180	210	210	270	220	260	190		250	310	350	350	280	200	230
Chloride			mg/L	93	96	97	99	97	97	71	71	120	78		140	160	150	190	120	210	122
Fluoride	4	4	mg/L	1.1 J+	1.1 J	0.84 J	0.83 J	0.99 J	0.87 J	0.83 J	0.76 J	0.78 J	1 J	0.8 J	0.76 J	0.73 J	0.64	0.76	1	1	0.78 J+
pH			SU	7.75	7.47		7.41	7.57	7.55	7.3	7.51	7.28	7.54	7.6	7.55	7.67	7.02	7.49		7.85	7.73
Sulfate			mg/l	580 J	480	500	440	58 C	490	730	720	540	580		690	760	890	940	1500	1500	884
Total Dissolved Solids			mg/L	1100	1000	1000	1000	1000	1000	1300	1200	1400	1200		1400	20 JD	1600	1800	2400	2400	1860
Appendix IV Parameters																					
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.00957 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.00095 J		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0058	0.0064	0.011	0.011	0.012	0.0097	0.012	0.0056	0.0081		0.0099	0.0097	0.011	0.0088	0.0071	0.0079	0.0078	0.008
Barium	2	2	mg/L	0.072	0.04	0.039	0.035	0.038	0.039	0.056	0.043	0.046		0.053	0.088	0.068	0.043	0.079	0.055	0.064	0.043
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.00022 J		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.00199 J	0.002 U	0.00026 J	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.001 U	0.00016 J	0.00019 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.00033 J		0.00054 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	4	4	mg/l	1.1 J	1.1 J	0.84 J	0.83 J	0.99 J	0.87 J	0.83 J	0.76 J	0.78 J	1 J	0.8 J	0.76 J	0.73 J	0.64	0.76	1	1	0.78 J
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0055 J	0.036 U	0.0032 J	0.0022 J	0.0058 J	0.0035 J	0.0072 J	0.006 J	0.0051 J		0.007 J		0.0059 J	0.0038 J	0.007 J	0.0054 J	0.0055 J	0.003 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0003 JD		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.013	0.012	0.012	0.012	0.012	0.013	0.028	0.016	0.013		0.016	0.015	0.012	0.011	0.014	0.02	0.029	0.017
Radium 226 + 228	5		pCi/L	1.31	1.05	0.866	0.794	0.993 J+	0.577	1.23	0.795	1.21		1.11 J+	0.99	1.17 J-	1.64 J+	0.584			1.5 U
Radium 226			pCi/L	0.651 U	0.458	0.427	0.413 U	0.502	0.348	0.835	0.54 U	0.559		0.448	0.535	0.591 U	0.719 U	0.783			0.673 U
Radium-228			pCi/L	0.68	0.59	0.467 U	0.435 U	0.491 J+	0.369 U	0.597	0.287 U	0.647		0.671 J+	0.455	0.522 U	0.919 J-	0.459 U			0.855
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.00061 J	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U		0.005 U		0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.001 U
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																					
Dissolved Oxygen			mg/L	1.23	1.63		0.39	0.3	0.21	0.12	0.32	0.16	0.15	0.23	0.25	1.02	4.21	0.33		3.42	0.14
Oxidation Reduction Potential			millivolts	-122.6	-89		-126.3	-148.5	-132.2	-139.2	-123.1	-32.7	-136.8	-75.5	-127.6	-101.5	-106.8	81.2		-99.5	-129.6
pH			SU	7.75	7.47		7.41	7.57	7.55	7.3	7.51	7.28	7.54	7.6	7.55	7.67	7.02	7.49		7.85	7.73
Specific Conductivity			uS/cm	1147	1297		1158	1230	1192	1645	1353	1665	1485	1142	1653	3104	2098	1692		2540	2595
Temperature			deg C	13.04	14.44		15.27	14.3	13.37	12.3	13.48	14.3	15	12.5	12.3	15	13.7	11.2		14.65	13
Turbidity			NTU	0.1	3.09		1.8	2.76	4.21	4.58	3.22	3.48	3.8	4.08	4.2	4.69	3.48	3.22		0.8	6.61

Notes
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-6 Screening Levels - 2021
Revision
MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
"U" = indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = indicates the result is estimated.
"J-" = indicates the result is estimated and may be biased low.
"J+" = indicates the result is estimated and may be biased high.
"UJ" = indicates the result was not detected above the MDL; the estimated RL is provided.
"D" = indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GANW17															
				2016-02-14	2016-09-08	2016-11-06	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-14		2018-04-23		2018-10-29	2019-05-09	2019-11-08	2020-04-24
				N	N	N	N	N	N	N	N	N	FD	N	FD	N	N	N	N	N
Appendix III Parameters																				
Boron		4	mg/L	12	12	11	11	11	8.9	7.6	12	12			5.8	5.8	16	7.7	4.9	7.6
Calcium			mg/L	150	160	170	180	200	130	120	150	64			110	110	200	130	120	160
Chloride			mg/L	110	100	130	150	140	81	100	160	100			60	58	150	90	92	100
Fluoride	4	4	mg/L	1.8 J+	2.0 J	2.0	1.9 J	1.6 J	1.6 J	0.79 J	1.8 J	2.4 J	5.0	1.7 J	1.9 J	1.9 J+	1.7	1.6	1.7	1.8 J+
pH			SU	7.56	7.27	7.21	7.33	7.54	7.23	7.4	7.16	7.12		7.62		7.82	6.85	7.53	7.75	7.54
Sulfate			mg/l	230 J	330	360	380	390	390	520	250	350			240	220	210	300	290	260
Total Dissolved Solids			mg/L	940	920	940	1000	1100	950	1400	890	1000			630	620	1100	800	880	1120
Appendix IV Parameters																				
Antimony	0.006	0.006	mg/L	0.00054 J	0.00032 J	0.00032 J	0.002 U	0.00028 J	0.002 U	0.002 U	0.002 U		0.002 U	0.002 U			0.002 U	0.002 U	0.002 U	0.002 U
Arsenic	0.01	0.01	mg/L	0.0054	0.0056	0.0042 J	0.0069	0.0059	0.0054	0.0015 J	0.0026 J		0.005 U	0.0027 J			0.0041 J	0.0021 J	0.0029 J	0.0023
Barium	2	2	mg/L	0.057	0.056	0.054	0.05	0.054	0.048	0.044	0.06		0.042	0.058		0.029	0.073	0.041	0.052	0.057
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.00076 J	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.0015 J	0.002 U	0.0017 J	0.0011 J	0.0017 J	0.0012 J	0.002 U	0.002 U		0.002 U	0.002 U			0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	6.3E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	4	4	mg/l	1.8 J	2.0 J	2.1	1.9 J	1.6 J	1.6 J	0.79 J	1.9 J	2.4 J	5.0	1.7 J	1.9 J	1.9 J	1.7	1.6	1.7	1.8 J
Lead	0.015	0.015	mg/L	0.00038 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0047 J	0.006 U	0.0038 J	0.0047 J	0.0014 J	0.0045 J	0.0058 J	0.0076 J		0.006 U	0.0035 J			0.0066 J	0.0035 J	0.0052 J	0.006 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U			0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.015	0.012	0.011	0.01 J	0.01	0.011	0.016	0.024		0.024	0.024		0.02	0.017	0.017	0.02	0.03
Radium 226 + 228	5		pCi/L	0.559	0.451 U	0.447 U	0.553 U	0.428	0.477	0.403 U	0.72		0.816 J+	0.384 U		0.205	1.1 J+	0.518 U		1.53 U
Radium 226			pCi/l	0.17	0.331	0.415 U	0.246 U	0.202	0.23	0.191 U	0.515		0.282	0.112		0.0399	0.315 U	0.26 U		0.783 U
Radium-228			pCi/L	1 U	0.451 U	0.447 U	0.553 U	0.402 U	0.408 U	0.403 U	0.495		0.614 J+	0.384 U		0.166	0.783 J+	0.518 U		0.797 U
Selenium	0.05	0.05	mg/l	0.019	0.03	0.018	0.023	0.026	0.026	0.0081	0.0032 J		0.0074	0.031		0.015	0.022	0.0041	0.011	0.0011
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.00083 J	0.001 U	0.001 U
Field Parameters																				
Dissolved Oxygen			mg/L	2.79	1.7	1.8	1.01	2.35	7.33	0.18	4.33	3.2		4.96		9	1.78	5.75	6.47	3.15
Oxidation Reduction Potential			millivolts	45.8	826.9	6.1	82.3	6.6	67.9	23.3	8	66.9		-90.2		-98.2	-23	53.1	65	25.2
pH			SU	7.56	7.27	7.21	7.33	7.54	7.23	7.4	7.16	7.12		7.62		7.82	6.85	7.53	7.75	7.54
Specific Conductivity			uS/cm	1059	1237	1141	1272	1541	1290	902	1152	1357		832		675	1523	894	798	1017
Temperature			deg C	17.23	20.6	13.63	13.6	10.55	11.8	17.71	14.4	22.3		10.5		11.4	20	12.1	12.23	9.31
Turbidity			NTU	1.56	1.09	0.58	2.58	2.41	2.21	1.02	1.5	2.51		0.51		1.19	0.45	0.11	0.86	0.73

Notes:
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-8 Screening Levels - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = Indicates the result was not detected above the method criterion, limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J-" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"UJ" = Indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = Indicates a result was identified as an outlier and removed from the data set.

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMWL7E															
				2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-04	2018-03-14	2018-04-23	2018-09-06	2018-10-29	2019-05-05	2019-11-08	2020-04-24
				N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters																			
Boron		4	mg/L	18	19	19	21	22	20	16	13	11		13	10	12	12	9.4	8.7
Calcium			mg/L	230	250	240	250	270	250	240	160	57		160	150	150	160	150	141
Chloride			mg/L	180	170	180	190	200	200	71	99	140		140	120	110	130	110	111
Fluoride	4	4	mg/L	0.9 J+	0.88 J	0.98 J	0.98 J	0.9 J	0.8 J	2.1 J	1.8 J	1.1 J	0.55 J	0.58 J	0.84 J	0.71	0.82	0.67	0.68 J+
pH			SU	7.43	7.37	7.1	7.24	7.44	7.03	7.25	7.19	7.38	7.48	7.39	7.53	7.4	7.15	7.66	7.22
Sulfate			mg/l	710 J	680	710	740	710	680	800	380	170		570	850	850	770	850	811
Total Dissolved Solids			mg/L	1500	1400	1400	1600	1700	1500	660	1000	950		1100	940	950	980	990	835
Appendix IV Parameters																			
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0024 J	0.0021 J	0.0024 J	0.0025 J	0.0023 J	0.0022 J	0.0023 J	0.0026 J		0.0011 J		0.0017 J	0.0023 J	0.0022 J	0.0019 J	0.0015
Barium	2	2	mg/L	0.078	0.078	0.086	0.092	0.1	0.089	0.065	0.06		0.085	0.069	0.069	0.079	0.11	0.074	0.065
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.000033 J	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.0033 J	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	4	4	mg/l	0.9 J	0.88 J	0.98 J	0.98 J	0.9 J	0.8 J	2.1 J	1.8 J	1.1 J	0.55 J	0.58 J	0.84 J	0.71	0.82	0.67	0.68 J
Lead	0.015	0.015	mg/L	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0017 J	0.008 J	0.008 U	0.0019 J	0.00046 J	0.0021 J	0.0019 J	0.008 U		0.008 U		0.008 U	0.008 U	0.008 U	0.008 U	0.008 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.004	0.021	0.013	0.011	0.012	0.011	0.017	0.021		0.017	0.016	0.01	0.011	0.0073 J	0.01	0.014
Radium 226 + 228	5		pCi/L	1.79	1.84	2.53	2.58	1.35	1.94	1.08	2.4		1.64 J+	1.21	1.47	2.43 J-	1.71		1.74
Radium 226			pCi/l	0.882 U	0.861	1.28	1.3	1.01	1.06	0.833 U	1.867		0.799	0.618	0.975	1.45 J-	0.966		0.671 U
Radium-228			pCi/L	0.913	0.98	1.25	1.17	0.423 U	0.846	0.395	1.53		0.845 J+	0.596	0.524	1.53 J-	0.748		1.12
Selenium	0.05	0.05	mg/l	0.005 U	0.005 J	0.005 U	0.00053 J	0.0051 J	0.005 U	0.005 U	0.005 U		0.005 U		0.001 J	0.005 U	0.005 U	0.005 U	0.001 U
Thallium	0.002	0.002	mg/L	0.001 U	0.001 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.00022 J	0.001 U	0.001 U
Field Parameters																			
Dissolved Oxygen			mg/L	0.33	0.24	0.67	0.36	0.13	0.13	0.18	3.14	0.09	0.16	0.11	0.2	0.83	0.22	4.2	0.2
Oxidation Reduction Potential			millivolts	-115	664	-100.8	-119.6	-91.8	102.8	-93.6	-51.1	-129.4	-95.2	-191.9	-83.9	-244.5	11.8	-5.9	-95.1
pH			SU	7.43	7.37	7.1	7.24	7.44	7.03	7.25	7.19	7.38	7.48	7.39	7.53	7.4	7.15	7.66	7.22
Specific Conductivity			uS/cm	1525	1734	1568	171.9	2251	1950	488	1244	1537	1235	1453	2072	1380	1060	890	920
Temperature			deg C	15.23	15.16	15.77	15	14.3	14.4	15.62	16.5	16.6	15.2	15.2	16.55	16.1	13.6	15.05	13.12
Turbidity			NTU	1.09	2.48	6.62	0.92	0.58	2.11	2.35	1.86	3.45	3.76	3.88	8.55	4.85	3.81	2.68	4.58

Notes:
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-8 Screening Levels - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = indicates the result is estimated.
"J-" = indicates the result is estimated and may be biased low.
"J+" = indicates the result is estimated and may be biased high.

"UJ" = indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = indicates a result was identified as an outlier and removed from the data set.

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW18																		
				2016-07-13	2016-09-08	2016-11-09		2017-01-10	2017-03-01	2017-04-26	2017-07-12		2017-08-23	2017-10-03		2018-03-14	2018-04-23	2018-10-25	2019-04-29	2019-11-07	2020-04-23
				N	N	FD	N	N	N	N	FD	N	N	FD	N	N	N	N	N	N	N	N
Appendix I I I Parameters																						
Boron		4	mg/L	1.8	3.5	1.9	1.8	1.3	1	0.77	1.2	1.2	1.5	1.9	1.9		1.2	1.7	0.95	1.7	1.2
Calcium			mg/L	320	610 O	370	360	330	280	210	280	290	300	380 J	64 J		320	230	320	360	294
Chloride			mg/L	17	39	17	17	9.3	5	4.3	10	10	11	23	23		7.3	22	12	27	16.7
Fluoride	4	4	mg/L	0.047 J+	0.036 J	10 U	10 U	5 U	5 U	2 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	0.057	0.074	0.15	0.17
pH			SU	6.95	6.83		6.7	6.88	7.11	6.6		6.96	7.02		6.91	7.2	7.21	6.54	6.71	7.18	6.96
Sulfate			mg/L	760 J-	1400	850	830	640	540	370	600	610	690	960	950		670	550	780	920	679
Total Dissolved Solids			mg/L	1300	2200	1500	1500	1200	1000	730	1100	1100	1300	1600	1500		2400	1100	1400	1500	1130
Appendix IV Parameters																						
Ant mony	0.006	0.006	mg/L	0.002 U	0.002 U	0.00096 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0014 J	0.0023 J	0.0014 J	0.00091 J	0.0014 J	0.005 U	0.0015 J	0.0021 J	0.0021 J	0.0011 J			0.005 U		0.005 U	0.00079 J	0.005 U	0.001 U
Bar um	2	2	mg/L	0.038	0.047	0.041	0.039	0.037	0.024	0.021	0.051	0.052	0.055			0.048	0.035	0.037	0.039	0.05	0.033
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.0002 U
Cadm um	0.005	0.005	mg/L	8.1E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.00067 J	0.00046 J	0.0005 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.001 U	0.00023 J	0.00047 J	0.0002 J	0.00024 J	0.001 U	0.00023 J	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.00028 J	0.001 U	0.001 U
Fluoride	4	4	mg/L	0.047 J+	0.036 J	10 U	10 U	5 U	5 U	2 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	0.057	0.074	0.15	0.17
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.00051 J	0.00025 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.00067 J		0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.00096 J	0.008 U	0.008 U	0.008 U	0.00042 J	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U			0.008 U		0.008 U	0.008 U	0.008 U	0.008 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ			0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.11	0.18 O	0.14 O	0.13 O	0.094	0.1	0.1	0.1	0.11	0.1			0.097	0.085	0.057	0.062	0.076	0.071
Radium 226 + 228	5		pCi/L	5 U	0.803	0.474	0.449	0.581 U	0.398 U	0.384 U	0.493	0.337 U	0.629			0.373 U	0.259	0.477	0.365 U		1.74 U
Radium-226			pCi/L	1 U	0.348	0.334 U	0.33 U	0.325	0.13	0.131 U	0.166 J+	0.179 J+	0.332			0.111	0.0715	0.291	0.325 U		0.789 U
Radium-228			pCi/L	1 U	0.49 U	0.455 U	0.413 U	0.581 U	0.398 U	0.384 U	0.381 U	0.337 U	0.369 U			0.373 U	0.187	0.357 U	0.365 U		0.947 U
Selenium	0.05	0.05	mg/L	0.01	0.018	0.0065	0.0052	0.0099	0.011	0.0053	0.012	0.012	0.006			0.009	0.0084	0.015	0.015	0.012	0.018
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																						
Dissolved Oxygen			mg/L	4.83	4.77		5.93	7.52	8.86	7.79		6.04	4.52		5.32	6.5	8.49	3.78	7.01	2.95	5.6
Oxidation Reduction Potential			millivolts	98.9	76.8		28.7	106.8	97.9	209.2		203.2	24.7		121.9	-129.6	-51.6	-36.6	129.2	-41.1	241.3
pH			SU	6.95	6.83		6.7	6.88	7.11	6.6		6.96	7.02		6.91	7.2	7.21	6.54	6.71	7.18	6.96
Specific Conductivity			uS/cm	1474	2362		1740	1255	986	970		1299	1414		1760	905	1170	1230	1060	1338	995
Temperature			deg C	16.3	20.1		16.6	9.65	8.47	11.2		17.9	19.8		19.3	8.1	8.9	17.4	8.8	14.2	9.18
Turbidity			NTU	3.32	1.63		2.38	3.05	4.44	2.48		1.71	1.03		4.16	4.59	0.71	1.29	4.55	2.04	1.33

Notes:
IDEM RCG Indiana Department of Environmental Management Remediation Closure Guidance Table A-6 Screening Levels - 2021 Revision

MCL Maximum Contaminant Level
mg/L milligrams per liter
SU standard units
pCi/L picoCuries per liter
uS/cm microSiemens per centimeter
deg C degrees Celsius
NTU Nepholometic Turbidity Un ts

"U" Indicates the result was not detected above the method detection limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" Indicates the result is estimated.
"J-" Indicates the result is estimated and may be biased low.
"J+" Indicates the resu t is estimated and may be biased high.

"UJ" Indicates the result was not detected above the MDL, the estimated RL is provided.

"O" Indicates te result was identified as an outlier and removed from the data set.

GOLDER
MEMBER OF WSP

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	CAMW13B						CAMW45								
				2018-09-10	2018-12-05		2019-04-25	2019-11-07	2020-04-23	2018-06-13	2018-09-12	2018-12-07	2019-06-06	2019-07-18	2019-08-26	2019-10-04	2019-11-19	2020-04-21
				N	FD	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters																		
Boron		4	mg/L	13	12	13	14	11	10.8	0.065 J0	0.1 U	0.033 J	0.1 U	0.032 J	0.053 J	0.043 J	0.049 J	0.1 U
Calcium			mg/L	260	200	220	240	190	299	56 O	14	28	15 J-	35	35	23	27	24.5
Chloride			mg/L	150	140	140	170	140	217	8.4 O	2.4	1.9		1.6	1.6	1.6	1.6	1.6
Fluoride	4	4	mg/L	0.77 J	0.74	0.73	0.89	0.89	0.91	0.052 J0	0.008	0.063		0.095	0.09	0.079 J+	0.082	0.082
pH			SU	7.73		6.86	7.15	7.68	7.21	7.93	8.17	8.23	7.52	8.15	7.9	7.81	7.77	8.64
Sulfate			mg/l	1100	1000	1100	1100	840	1230	65 O	31	50		28	26	30	27	24.7
Total Dissolved Solids			mg/L	2100	2000	2200	2100	1500	2060	280 O	160	150		130	150	140 J+	140	101
Appendix IV Parameters																		
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 J	0.002 U	0.002 U	0.001 U	0.002 UO	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0018 J	0.0028 J	0.0026 J	0.0037 J	0.0041 J	0.0029	0.0014 JO	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.00086 J	0.002 U	0.001 U
Barium	2	2	mg/L	0.048	0.035	0.038	0.049	0.024	0.041	0.027 O	0.0028 J	0.00159	0.0065	0.0064	0.0064	0.0049 J	0.0059	0.0053
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.001 UO	0.005 U	0.001 U	0.001 U	0.001 U	0.001 U	0.00054 J	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 J	0.001 U	0.001 U	0.0002 U	0.001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.002 J	0.002 U	0.002 U	0.002 U	0.002 UO	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.0024 J	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.00927 J	0.00926 J	0.00838 J	0.00924 J	0.00924 J	0.001 U	0.0002 JO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	4	4	mg/l	0.77 J	0.74	0.73	0.88	0.89	0.91	0.052 JO	0.008	0.063		0.095	0.09	0.079 J+	0.082	0.082
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.025	0.015	0.016	0.023	0.015	0.026	0.009 UO	0.04 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UO	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.014	0.014	0.015	0.016	0.011	0.019	0.0051 JO	0.01	0.01 U	0.01 U	0.01 U	0.01 U	0.0015 J	0.01 U	0.001 U
Radium 226 + 228	5		pCi/L	1.7	1.28	1.46			1.7 U	0.384 UO	0.488 U	0.33 U		0.427 U	0.535 U	0.568		1.7 J
Radium 226			pCi/l	0.773 U	0.717	0.748	0.41		0.882 U	0.244 UO	0.103 U	0.0708 U		0.214 U	0.0925 U	0.179 U		0.741 U
Radium-228			pCi/L	0.928	0.562	0.708	0.945		0.821 U	0.384 UO	0.488 U	0.33 U		0.427 U	0.535 U	0.481 U		0.95 U
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.001 U	0.001 UO	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.001 U
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.00059 J	0.001 U	0.001 U
Field Parameters																		
Dissolved Oxygen			mg/L	0.24		0.29	0.92	0.36	0.18	2.12	1.85	4.18	6.44	6.59	4.03	2.44	3.36	3.42
Oxidation Reduction Potential			millivolts	-148.2		-103.4	109.2	-144.8	-77.7	-171.4	1.9	67	169.6	256	40.6	9.10	-141.1	125.0
pH			SU	7.73		6.86	7.15	7.68	7.21	7.93	8.17	8.23	7.52	8.15	7.9	7.81	7.77	8.64
Specific Conductivity			uS/cm	3311		2147	1902	1475	1897	367	155	161	179	153	153	152	132	208
Temperature			deg C	15.39		14.9	11.8	13.7	12.1	11.4	8	9.1	11.5	13.2	14.2	14.8	11.7	8.3
Turbidity			NTU	3.78		8.58	3.21	8.14	2.35	3.96	1.91	1.33	0.5	0.8	0.69	0.89	0.66	2.18

Notes
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table 4-6 Screening Levels - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uSiem = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = indicates the result was not detected above the method criterion, limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = indicates the result is estimated.
"J+" = indicates the result is estimated and may be biased low.
"J-" = indicates the result is estimated and may be biased high.

"UJ" = indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW4B										GAMW5S					
				2018-05-15	2019-03-04	2019-04-17	2019-06-07	2019-07-18	2019-08-26	2019-10-04	2019-11-19	2020-04-21	2018-10-10	2018-10-31	2019-05-09	2019-11-14		2020-04-30
				N	N	N	N	N	N	N	N	N	N	FD	N	N	FD	N	N
Appendix III Parameters																			
Boron		4	mg/L	0.05 JO	0.05 J	0.027 J	0.049 J	0.03 J	0.05 J	0.047 J	0.046 J	0.1 U	0.39		0.14	0.077 J		0.15	0.1 U
Calcium			mg/L	55 D	58	59	56	52	59	48	56	53.9	55		59	52		72	48.3
Chloride			mg/L	8 D	7.9	7.8		7.2	8	7.1	6.8	6.6	34		9.2	6.8		37	32
Fluoride	4	4	mg/L	0.048 JD	0.066	0.076		0.062	0.069	0.073 J+	0.072	0.084	0.39 J		0.3	0.29 J+		0.3	0.25
pH			SU	8.3	7.11	7.59	7.58	8.16	7.62	7.44	7.47	8.03	7.5		7.06	7.17		7.59	7.98
Sulfate			mg/l	59 D	61	61		61	68	65	67	58.8	86		39	34		67	71.8
Total Dissolved Solids			mg/L	150 D	280	290		240	320 J	250	240	209	400		250	240		350	295
Appendix IV Parameters																			
Antimony	0.006	0.006	mg/L	0.002 UD	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.002 U		0.002 U	0.002 U		0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0015 JO	0.0012 J	0.00976 J	0.005 U	0.00091 J	0.00095 J	0.0013 J	0.001 J	0.001 U	0.005 U		0.005 U	0.005 U		0.005 U	0.001 U
Barium	2	2	mg/L	0.0096 O	0.027	0.029	0.025	0.025	0.024	0.021	0.025	0.026	0.039		0.015	0.015		0.02	0.015
Beryllium	0.004	0.004	mg/L	0.001 UD	0.0011	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0011	0.00052 U	0.002 U		0.001 U	0.002 U		0.001 U	0.00052 J
Cadmium	0.005	0.005	mg/L	0.001 UD	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.001 U		0.00024 J	0.001 U		0.001 U	0.0002 J
Chromium	0.1	0.1	mg/l	0.007 D	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U	0.002 U		0.002 U	0.002 U
Cobalt		0.006	mg/L	0.00034 JO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.00058 J		0.00031 J	0.001 U		0.001 U	0.001 U
Fluoride	4	4	mg/l	0.048 JD	0.066	0.076		0.062	0.069	0.073 J+	0.072	0.084	0.39 J		0.3	0.29 J+		0.3	0.25
Lead	0.015	0.015	mg/L	0.001 UD	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U		0.001 U	0.001 U
Lithium		0.04	mg/L	0.009 UD	0.0017 J	0.003 U	0.008 U	0.002 J	0.008 U	0.008 U	0.003 J	0.008 U	0.0027 J		0.008 U	0.008 U		0.0025 J	0.008 U
Mercury	0.002	0.002	mg/L	0.0002 UD	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U		0.0002 U	0.0002 J
Molybdenum		0.1	mg/L	0.0018 JO	0.0024 J	0.0022 J	0.0025 J	0.00228 J	0.0026 J	0.0025 J	0.003 J	0.0021	0.005 J		0.0035 J	0.0026 J		0.0017 J	0.0012
Radium 226 + 228	5		pCi/L	0.392 UD	0.402 U	0.308 U		0.427 U	0.609 U	0.408 U		1.68 U	0.796		1 U	0.53 U			1.64 J
Radium 226			pCi/l	0.273 UD	0.286	0.108		0.332 U	0.205 U	0.192 U		0.881 U	0.796 U		0.296 U	0.056			0.736 U
Radium-228			pCi/L	0.392 UD	0.402 U	0.308 U		0.427 U	0.609 U	0.408 U		1.15	0.392 U		0.706 J+	0.53 U			0.904 U
Selenium	0.05	0.05	mg/l	0.0017 JO	0.005 U	0.005 U	0.005 U	0.003 U	0.005 U	0.005 U	0.005 U	0.001 U	0.005 U		0.0014 J	0.0014 J		0.0011 J	0.001 U
Thallium	0.002	0.002	mg/L	0.001 UD	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.00068 J	0.001 U	0.001 U		0.001 U	0.001 U		0.001 U	0.001 U
Field Parameters																			
Dissolved Oxygen			mg/L	2.09	0.09	1.8	0.2	1.4	1.25	0.31	0.3	0.17	0.49		0.21	6.42		2.2	5.9
Oxidation Reduction Potential			millivolts	-29.4	111.9	-111.1	-135.1	-93.9	-119.9	33.7	-229.6	-137.4	-30.3		35.1	108.2		-43.8	166.6
pH			SU	8.3	7.11	7.59	7.58	8.16	7.62	7.44	7.47	8.03	7.5		7.06	7.17		7.59	7.98
Specific Conductivity			uS/cm	211	268	294	282	274	284	260	242	405	0.396		448	368		320	389
Temperature			deg C	11.3	8.6	10.8	11	11.5	12.3	12.3	11.3	10	19.37		17.6	14.2		15.5	10.8
Turbidity			NTU	8.45	3.26	4.9	3.25	3.11	1.75	1.16	2.84	8.02	0.45		0.83	0.42		0.71	1.57

Notes:
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table A-6 Screening Levels - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = indicates the result was not detected above the method criterion limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = indicates the result is estimated.
"J+" = indicates the result is estimated and may be biased low.
"J-" = indicates the result is estimated and may be biased high.

"UJ" = indicates the result was not detected above the MDL; the estimated RL is provided.
"O" = indicates a result was identified as an outlier and removed from the data set.

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW52B					GAMW53					GAMW53B				
				2018-09-11	2018-10-31	2019-05-06	2019-11-14	2020-04-30	2018-09-12	2018-10-31	2019-04-30	2019-11-14	2020-05-01	2018-09-11	2018-10-30	2019-04-30	2019-11-14	2020-05-01
				N	N	N	N	N	N	N	N	N	N	N	FD	N	N	N
Appendix III Parameters																		
Boron		4	mg/L	0.76	0.8	1	1.5	0.77	0.19	0.25	0.056 J	0.13	0.1 U	2.5		3.1	2.2	0.73	3.4
Calcium			mg/L	160	160	140	130	129	45	53	47	25	32	100		100	150	140	103
Chloride			mg/L	330	470	380	370	390	6.9	6.6	6.9	3.6	4.8	88		86	81	74	107
Fluoride	4	4	mg/L	0.18 U	0.18	0.21 J+	0.23	0.26	0.27 J	0.17	0.05 U	0.05 U	0.05 U	0.52 J		0.49	0.52	0.7	0.48
pH			SU	8.3	7.1	7.42	7.34	7.6	8	6.47	5.93	6.21	6.42	7.3		7.35	7.45	7.52	7.48
Sulfate			mg/l	210	160	220	280	216	51	56	32	38	32.5	430		510	340	320	488
Total Dissolved Solids			mg/L	1500	1200	1100	1100	1260	240	250	130	160	161	1100		1100	900	770	1050
Appendix IV Parameters																		
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.002 U	0.002 U	0.002 U	0.00061 J	0.001 U	0.002 U		0.002 U	0.002 J	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0013 J	0.0016 J	0.00083 J	0.0012 J	0.0011	0.013	0.012	0.00097 J	0.0018 J	0.0015	0.00379 J		0.00083 J	0.001 J	0.0016 J	0.0028
Barium	2	2	mg/L	0.32	0.31	0.26	0.28	0.29	0.027	0.028	0.029	0.026	0.023	0.052		0.054	0.044	0.072	0.099
Beryllium	0.004	0.004	mg/L	0.001 U	0.00042 J	0.001 U	0.001 U	0.0002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.001 U		0.001 U	0.00059 J	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.00029 J	0.001 U	0.001 U	0.0002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.001 U		0.001 U	0.001 J	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.00167	0.0018 J	0.0015 J	0.002 U	0.002 U	0.002 U		0.002 U	0.002 J	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.001 U	0.00032 J	0.001 U	0.001 U	0.0011	0.00084 J	0.00098 J	0.0005 J	0.001 U	0.001 U	0.001 U		0.001 U	0.001 J	0.001 U	0.001 U
Fluoride	4	4	mg/l	0.18 U	0.18	0.21 J+	0.23	0.26	0.27 J	0.17	0.05 U	0.05 U	0.05 U	0.52 J		0.49	0.52	0.7	0.48
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0014	0.00085 J	0.00057 J	0.00063 J	0.001 U	0.001 U		0.001 U	0.001 J	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0042 J	0.0031 J	0.0033 J	0.0071 J	0.0035	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.0042 J		0.0052 J	0.005 J	0.0056 J	0.011
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.014	0.015	0.0095 J	0.0086 J	0.019	0.014	0.015	0.0051 J	0.012	0.0068	0.0089 J		0.0075 J	0.0098 J	0.02	0.016
Radium 226 + 228	5		pCi/L	5.52	5.35 J+	2.83		2.44	0.547 U	1.45 J+	0.344 U		1.9 U	1.69		0.48 J+	1.26		1.73
Radium 226			pCi/L	3.11	2.78 J+	2.0		1.76	0.257	0.795 J+	0.316 U		1.08 U	0.789		0.338 J+	0.514		0.845
Radium-228			pCi/L	1.41	2.78 J+	1.44		0.885 U	0.547 U	0.658 J+	0.344 U		0.832 U	0.897		0.342 U	0.75		0.886 J+
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.005 U	0.005 U	0.001 U	0.005 U	0.005 U	0.005 U	0.005 U	0.001 U	0.005 U		0.005 U	0.005 J	0.005 U	0.001 U
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.00049 J	0.001 U	0.001 U
Field Parameters																		
Dissolved Oxygen			mg/L	0.44	0.1	0.15	0.19	2.09	0.53	0.98	2.12	0.04	1.39	0.26		0.8	0.36	0.09	0.12
Oxidation Reduction Potential			millivolts	-214.9	-198.5	6.31	-102.9	-104.2	-24.0	-199.5	43.7	-24.8	168	-183.2		-198	27.7	-76.5	-128.9
pH			SU	8.3	7.1	7.42	7.34	7.6	8	6.47	5.93	6.21	6.42	7.3		7.35	7.45	7.52	7.48
Specific Conductivity			uS/cm	1934	2005	1662	1353	2424	307	400	125	155	260	1354		1620	1160	870	1634
Temperature			deg C	17.25	16.5	15.3	16.1	15.3	21.3	20.1	11.4	17.5	13.3	20.89		20.4	18.7	19.7	20.2
Turbidity			NTU	1.6	0.88	0.35	1.01	1.42	0.93	5.17	1.26	4.6	4.8	2.43		3	3.45	2.5	7.86

Notes:
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Remediation Closure Guidance Table 4-6 Screening Levels - 2021
Revision

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pCi/L = picoCuries per liter
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deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = indicates the result was not detected above the method criterion, limit (MDL) for the sample; the quantitation limit (RL) is provided
"J" = indicates the result is estimated.
"J-" = indicates the result is estimated and may be biased low.
"J+" = indicates the result is estimated and may be biased high.

"FD" = indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW5R					GAMW54S							GAMW55				GAMW55I	
				2018-09-10	2018-10-31	2019-04-30	2019-11-14	2020-05-04	2018-09-10		2018-10-31	2019-05-01	2019-11-15	2020-05-04		2018-09-10		2018-10-29		2019-11-15	2020-05-05
				N	N	N	N	N	N	FD	N	N	N	FD	N	FD	N	FD	N	N	N
Appendix III Parameters																					
Boron		4	mg/L	0.85	0.77	0.39	0.57	0.42	5.6		6.5	5.9	6		2.7	1.9	1.9	1.8	1.8	1.1	0.96
Calcium			mg/L	91	86	93	81	131	210		220	200	240		214	260	250	270	260	160	168
Chloride			mg/L	15	10	10	4	12.3	100		95	110	120		68.3	59	59	65	70	61	40.3
Fluoride	4	4	mg/L	0.18 J	0.17	0.14	0.28	0.18	0.41 J		0.52	0.59	0.58		0.54	0.51 J	0.52 J	0.47	0.47	0.62	0.52
pH			SU	6.24	7.92	6.82	7.08	5.74	6.95		8.72	7.27	7.2		7.43		8.77		7.04	7.81	7.51
Sulfate			mg/l	190	150	190	76	284	750		730	710	770		176	590	600	630	620	480	375
Total Dissolved Solids			mg/L	500	400	470	350	648	1900		1400	1500	1400		1000	1200	1300	1300	1300	859	845
Appendix IV Parameters																					
Antimony	0.006	0.006	mg/L	0.0011 J	0.000074 J	0.00078 J	0.001 U	0.001 U	0.002 U		0.002 U	0.002 U	0.002 U		0.001 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0024 J	0.0028 J	0.0022 J	0.0045 J	0.0045	0.0025 J		0.0031 J	0.0045 J	0.005		0.0042	0.00083 J	0.005 U	0.005 U	0.005 U	0.005 U	0.001 U
Barium	2	2	mg/L	0.049	0.039	0.021	0.031	0.052	0.098		0.083	0.08	0.089		0.06	0.099	0.097	0.088	0.089	0.035	0.046
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.001 U		0.001 U	0.001 U	0.001 U		0.0002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.001 U		0.001 U	0.001 U	0.001 U		0.0002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.007 U		0.007 U	0.0037 U	0.007 U		0.005 U	0.007 U	0.007 U	0.007 U	0.007 U	0.007 U	0.005 U
Cobalt		0.006	mg/L	0.00053 J	0.00052 J	0.00062 J	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U		0.001 U	0.0065	0.0058	0.0044	0.0044	0.001 U	0.001 U
Fluoride	4	4	mg/l	0.18 J	0.17	0.14	0.28	0.18	0.41 J		0.52	0.59	0.58		0.54	0.51 J	0.52 J	0.47	0.47	0.62	0.52
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 J	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.009 U	0.036 U	0.009 U	0.0023 J	0.003 U	0.0046 J		0.0036 J	0.0049 J	0.0074 J		0.009 U	0.0021 J	0.0027 J	0.002 U	0.002 U	0.0035 J	0.009 U
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 J	0.0002 J	0.0002 U	0.0002 U	0.0002 J	0.0002 U
Molybdenum		0.1	mg/L	0.005	0.004	0.025	0.03	0.014	0.018		0.059	0.0085 J	0.012		0.018	0.03	0.028	0.026	0.026	0.024	0.02
Radium 226 + 228	5		pCi/L	0.5	1.08 J+	0.393 U		1.51 U	2.03		2.7 J+	1.82			1.41 U	1.4	0.832	0.922 J+	1.24 J+		1.58 U
Radium 226			pCi/L	0.386 U	0.737 U	0.337 U		0.73 U	1.18 J+		1.35 J+	0.956			0.854 U	0.574 U	0.471 U	0.383 U	0.847 U		0.387 U
Radium-228			pCi/L	0.385 U	0.343 J+	0.393 U		0.783 U	0.849		1.35 J+	0.865			0.754 U	0.824	0.433 U	0.559 J+	0.796 J+		1.34
Selenium	0.05	0.05	mg/l	0.0017 U	0.0022 U	0.0033 U	0.00357	0.0073	0.005 U		0.005 U	0.005 U	0.005 U		0.001 U	0.0037 U	0.0031 U	0.0022 U	0.0022 U	0.0046 U	0.0046
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U		0.001 U	0.00021 J	0.001 U	0.00023 J	0.00022 J	0.00022 J	0.001 U
Field Parameters																					
Dissolved Oxygen			mg/L	0.61	1.41	0.72	0.26	2.65	0.42		2.12	0.42	0.31		0.1		1.73		0.33	0.72	1.35
Oxidation Reduction Potential			millivolts	107.8	-294.7	48.4	-69.5	24.5	-323.4		-315.7	-23.1	-43.3		-114.5		21.6		-68.4	-28.8	148.6
pH			SU	6.24	7.92	6.82	7.08	5.74	6.95		8.72	7.27	7.2		7.43		8.77		7.04	7.81	7.51
Specific Conductivity			uS/cm	675	630	493	374	960	1816		1983	1635	2010		0.63		1493		1574	1017	1270
Temperature			deg C	21.2	16.53	10.5	15.3	11.4	17.6		17.29	15.5	15.8		15.6		21.1		19.4	16.7	12.8
Turbidity			NTU	3.09	1	9.91	2.31	1.9	1.2		1.61	4.29	5.67		1.31		1.71		3.66	0.26	0.1

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Revision

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deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

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"J" = Indicates the result is estimated.
"J+" = Indicates the result is estimated and may be biased low.
"J-" = Indicates the result is estimated and may be biased high.

"UJ" = Indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = Indicates a result was identified as an outlier and removed from the data set

GOLDER

Table 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW55B							GAMW55						GAMW56B				
				2018-09-11		2018-10-29	2019-05-01	2019-11-15	2020-05-05		2013-09-11	2018-10-26	2019-04-29	2019-11-15	2020-05-05		2018-09-11	2018-10-29	2019-04-29	2019-11-15	2020-05-05
				FD	N	N	N	N	FD	N	N	N	N	N	FD	N	N	N	N	N	N
Appendix III Parameters																					
Boron		4	mg/L	7.1	7.4	8.2	9.1	11	9.21 J	10.9 J	0.26	0.28	0.21	0.2		0.22	1.2	1.2	1.3	1.2	1.1
Calcium			mg/L	250	253	260	210	210	116 J	219 J	130	110	95	123		115	140	140	150	150	141
Chloride			mg/L	220	220	190	170	190	119	215	3.1	2.4	3.2	2.1		2.8	50	50	55	64	50.8
Fluoride	4	4	mg/L	0.29 J	0.3 U	0.25	0.32	0.31	0.32	0.32	1.4 J	0.59	0.53	0.67		0.66	0.41 J	0.33	0.4	0.44	0.55
pH			SU		7.07	7.19	7.31	7.45		7.48	5.83	7.17	5.83	7.06		7.05	6.95	6.91	7.08	7.21	7.52
Sulfate			mg/l	820	830	810	790	760	678	674	57	63	54	56		56.3	170	190	260	280	280
Total Dissolved Solids			mg/L	1800	1930	1830	1700	1403	1400	1420	470	480	420	440		456	740	690	830	860	753
Appendix IV Parameters																					
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.001 U	0.002 U	0.002 U	0.002 U	0.002 U		0.001 U	0.002 U	0.002 U	0.002	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0014 J	0.0011 J	0.005 U	0.005 U	0.005 U	0.0079 J	0.001 UJ	0.019	0.022	0.011	0.0097		0.0076	0.005 U	0.005 U	0.005	0.005 U	0.001 U
Barium	2	2	mg/L	0.14	0.14	0.12	0.074	0.067	0.045 J	0.067 J	0.068	0.049	0.044	0.04		0.047	0.076	0.072	0.082	0.079	0.071
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U	0.001 U	0.001 U	0.001 U	0.001 U		0.0002 U	0.001 U	0.001 U	0.001	0.001 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U	0.001 U	0.001 U	0.001 U	0.001 U		0.0002 U	0.001 U	0.001 U	0.001	0.001 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U	0.002 U	0.002 U	0.002	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.00034 J	0.00028 J	0.001 U	0.001 U	0.001 U	0.0087 J	0.001 UJ	0.0017	0.0053	0.0064	0.0081		0.0092	0.001 U	0.001 U	0.001	0.001 U	0.001 U
Fluoride	4	4	mg/l	0.29 J	0.3 U	0.25	0.32	0.31	0.32	0.32	1.4 J	0.59	0.53	0.67		0.66	0.41 J	0.33	0.4	0.44	0.55
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U	0.001	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0064 J	0.0064 J	0.0054 J	0.0055 J	0.0078 J	0.003 U	0.013	0.0024 J	0.0029 J	0.0023 J	0.0053 J		0.002 U	0.0051 J	0.0035 J	0.0044	0.0062 J	0.0032
Mercury	0.002	0.002	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	0.0057 J	0.0056 J	0.0065 J	0.0046 J	0.005 J	0.0049 J	0.0053 J	0.0019	0.0044 J	0.00472 J	0.00459 J		0.0068	0.0094 J	0.009 J	0.0092	0.0084 J	0.0065
Radium 226 + 228	5		pCi/L	5.35	3.18	3.55 J+	3.08		3.06	3.02	0.738	0.693 J+				1.24 U	1.26	1.23 J+			2.11
Radium 226			pCi/L	1.72	1.25	1.85 U	1.15		1.29	1.66	0.565	0.357 U	0.331 U			0.509 U	0.763	0.578 U	0.506		0.966
Radium-228			pCi/L	1.63	1.43	1.79 J+	0.926		1.83	1.36	0.371 U	0.429 U	0.373 U			0.735 U	0.493	0.598 J+	0.571		1.23 U
Selenium	0.05	0.05	mg/l	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.002	0.001 U	0.005 U	0.005 U	0.005 U	0.005 U		0.0022	0.005 U	0.005 U	0.005	0.005 U	0.001 U
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U	0.001	0.001 U	0.001 U
Field Parameters																					
Dissolved Oxygen			mg/L		0.17	0.17	0.12	0.17		0.1	0.96	0.28	1.3	0.34		0.21	0.29	0.25	0.79	0.19	0.09
Oxidation Reduction Potential			millivolts		-129.6	-126.9	-57.6	-137.8		-101.9	-97.4	-95.4	34	-86.6		-42.1	-102.8	-44.4	91.9	-105.7	-106.5
pH			SU		7.07	7.19	7.31	7.45		7.45	6.82	7.17	5.83	7.06		7.05	6.95	6.91	7.08	7.21	7.52
Specific Conductivity			uS/cm		2199	2231	1967	1491		2016	749	835	460	465		782	928	1036	855	741	1179
Temperature			deg C		19.2	18.5	18.1	17.9		17.1	17	15.7	8.7	14		9.6	13.8	13.8	11.6	12.9	11.8
Turbidity			NTU		4.38	1.24	0.77	3.02		1.11	2.81	2.99	2.31	2.05		2.4	2.06	1.45	4.27	1.1	4.56

Notes:
IDEM RCGs= Indiana Department of Environmental Management
Remediation Closure Guidance Table A-6 Screening Levels - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = milligrams per liter
SU = standard units
pCi/L = picoCuries per liter
uS/cm = microSiemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units

"U" = Indicates the result was not detected above the method criterion, limit (MDL) for the sample; the quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J+" = Indicates the result is estimated and may be biased low.
"J+" = Indicates the result is estimated and may be biased high.

"UJ" = Indicates the result was not detected above the MDL; the estimated RL is provided.
"R" = Indicates a result was identified as an outlier and removed from the data set.

Prepared by: KMC
Checked by:
Reviewed by:

GOLDER

Table 3: General Groundwater Response Actions
CCR Unit Schahfer MSRB, MCWB, and DA
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

General Response Action	Comments	Corrective Measure Area	
		Below CCR Unit	Downgradient of CCR Unit
Limited Action	Access Restrictions Institutional Controls Use Restrictions Environmental Monitoring Monitored Natural Attenuation	X	X
Containment	Physical	X	
Removal	Extraction	X	X
Treatment	In-Situ Ex-Situ	X	X
On-Site Disposal	Surface Water Discharge Groundwater Discharge POTW Discharge	X	X
Off-Site Disposal	Permitted Disposal Facility	X	X

Notes
X- General Response Action selected for further screening at the indicated Corrective Measure Area

Prepared by: DFS
Checked by: KMC
Reviewed by: MAH

Table 4: Initial Screening of Corrective Measure Alternatives / Process Options for Groundwate
CCR Unit Schahfer MSRB, MCWB, and DA
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

General Response Action	Remedial Technology	Process Option	Description	Screening Comments	Retained for Further Evaluation	
					Below CCR Unit	Downgradient of CCR Unit
Limited Ac ion	Institutional Controls	Permitting and Notices	Administra ive controls to restrict groundwater use.	Potentially implementable.	Yes	Yes
		Access Restrictions	Physical restrictions or structures that prevent access by unauthorized persons.	Potentially implementable.	Yes	Yes
	Monitoring	Groundwater Monitoring	Periodic sampling and analyses of groundwater as a means of detecting unacceptable changes in constituent concentrations.	Potentially implementable.	Yes	Yes
	Use Restriction	Deed Restrictions	Administrative controls to provide future land use restrictions	Potentially implementable.	Yes	Yes
	Monitored Natural Attenuation	Monitored Natural Attenuation	Long-term monitoring of natural attenuation, including advection/dispersion/adsorption and biotic and abiotic degrada ion/transformation, of the inorganic constituents dissolved in groundwater; advection/dispersion/adsorption of inorganics.	Potentially implementable.	Yes	Yes
Containment	Physical Containment	Capping	Low-permeable cap covering the source area.	Potentially implementable, minimizes stormwater infiltration reducing the potential for plume migration.	Yes	NA
		Vertical Barriers	Vertical barriers including slurry walls and sheet piling placed around the area of contamination to contain groundwater.	Potentially implementable, reduces poten ial for plume migration.	Yes	NA
Removal	Extraction	Extraction Wells	Use of extraction wells to extract contaminated groundwater and control groundwater movement within capture zone.	Poten ially implementable, results in physical removal of dissolved constituents of concern and reduces potential for plume migration.	Yes	Yes
		Extraction Trench	Removal of groundwater by pumping from extraction trenches.	Poten ially implementable, results in physical removal of dissolved constituents of concern and reduces potential for plume migration.	Yes	Yes
In Situ Treatment	Stabilization/ Solidification	Solidification	Blending soil with grout to contain and immobilize contaminated groundwater.	Potentially implementable for the corrective measure area below he CCR Unit. Reduces potential for plume migration.	Yes	No
	Permeable Reactive Barrier	Vertical Reactive Barrier	Construction of vertical reactive barrier (e.g., carbon wall) to treat groundwater as it flows through the treatment zone.	Not effective on all Site COCs, limited effectiveness on Sites with high groundwater velocity.	No	No
In Situ Treatment	Chemical Addition/ Treatment	Chemical Precipitation	Increasing inorganic precipitation through chemical injection, either by changing site geochemical conditions (i.e., pH, Eh, or ionic strength) or the addition of a co-precipitate that reacts with or acts as an adsorbent for the COC.	Not effective on all Site COCs.	No	No
		Chemical Reduction	Injection of a reducing agent such as nanoscale or microscale zero valent iron into groundwater. Reduction reactions chemically convert constituents to non-hazardous or less toxic compounds that are more stable, less mobile, and/or inert.	Not effective on all Site COCs.	No	No
	Biological Treatment	Bioremediation	Use of microorganisms to oxidize/reduce metal contaminants directly or by the production of chemical oxidizing/reducing agents.	Not effective on all Site COCs.	No	No

Table 4: Initial Screening of Corrective Measure Alternatives / Process Options for Groundwate
CCR Unit Schahfer MSRB, MCWB, and DA
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

General Response Action	Remedial Technology	Process Option	Description	Screening Comments	Retained for Further Evaluation	
					Below CCR Unit	Downgradient of CCR Unit
Ex Situ Treatment	On-Site Treatment Facility	On-Site, Various Physical/chemical Process Options	Extracted groundwater is pumped to the on-Site treatment facility (physical/chemical treatment).	Potentially implementable to treat extracted contaminated groundwater. Treatment processes that could remediate the Site COCs include chemical/physical precipitation, activated carbon, and reverse osmosis.	Yes	Yes
Disposal	On-Site Discharge	On-Site Discharge to Surface Water	Treated groundwater discharged to local water body pursuant to updated NPDES permit.	Potentially implementable. Treated landfill leachate is currently discharged to a local water body pursuant to a NPDES permit.	Yes	Yes
		On-Site Discharge to Groundwater	Treated groundwater discharged to groundwater within the Station Area.	Potentially implementable.	Yes	Yes
		POTW Discharge	Discharge of treated groundwater to POTW under a discharge authorization.	No access to POTW.	No	No
	Off-Site Treatment	Off-Site Disposal/Treatment of Collected Groundwater	Transport and treatment of extracted groundwater at off-Site treatment facility.	Not retained due to higher safety concerns and much higher disposal costs.	No	No

Notes
COC- constituent of concern
NPDES- National Pollutant Discharge Elimination System
POTW- publicly owned treatment works
NA- not applicable

Prepared by: DFS
Checked by: KMC
Reviewed by: MAH

**Table 5: Summary of Groundwater Corrective Measure Alternatives
For Multi-Cell Unit (MSRB, MCWB, and DA)
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana**

Alternative		Key Components
A	Monitored natural attenuation	Permitting Implementation of deed restrictions Environmental monitoring
B	Vertical barrier/hydraulic controls and monitored natural attenuation	Permitting Implementation of deed restrictions Installation of hydraulic controls within existing vertical barrier wall *x situ* treatment of pumped groundwater by an on-Site treatment facility Disposal of treated groundwater to on-Site surface water or groundwater NPDES permit or installation of injection wells and UIC permit Long-term maintenance Environmental monitoring
C	Pump-and-treat and monitored natural attenuation	Permitting Implementation of deed restrictions Installation of monitoring wells or extraction trench immediately downgradient of the slurry wall *x situ* treatment of pumped groundwater by an on-Site treatment facility Disposal of treated groundwater to on-Site surface water or groundwater NPDES permit or of injection wells and UIC permit Long-term maintenance Environmental monitoring
D	Vertical barrier/hydraulic controls, pump-and-treat, and monitored natural attenuation	Permitting Implementation of deed restrictions Installation of hydraulic controls within existing vertical barrier wall Installation of monitoring wells or extraction trench outside the vertical barrier wall *x situ* treatment of pumped groundwater by an on-Site treatment facility Disposal of treated groundwater to on-Site surface water or groundwater NPDES permit or of injection wells and UIC permit Long-term maintenance Environmental monitoring

Prepared by: JBG
Checked by: CMJ
Reviewed by: JBG

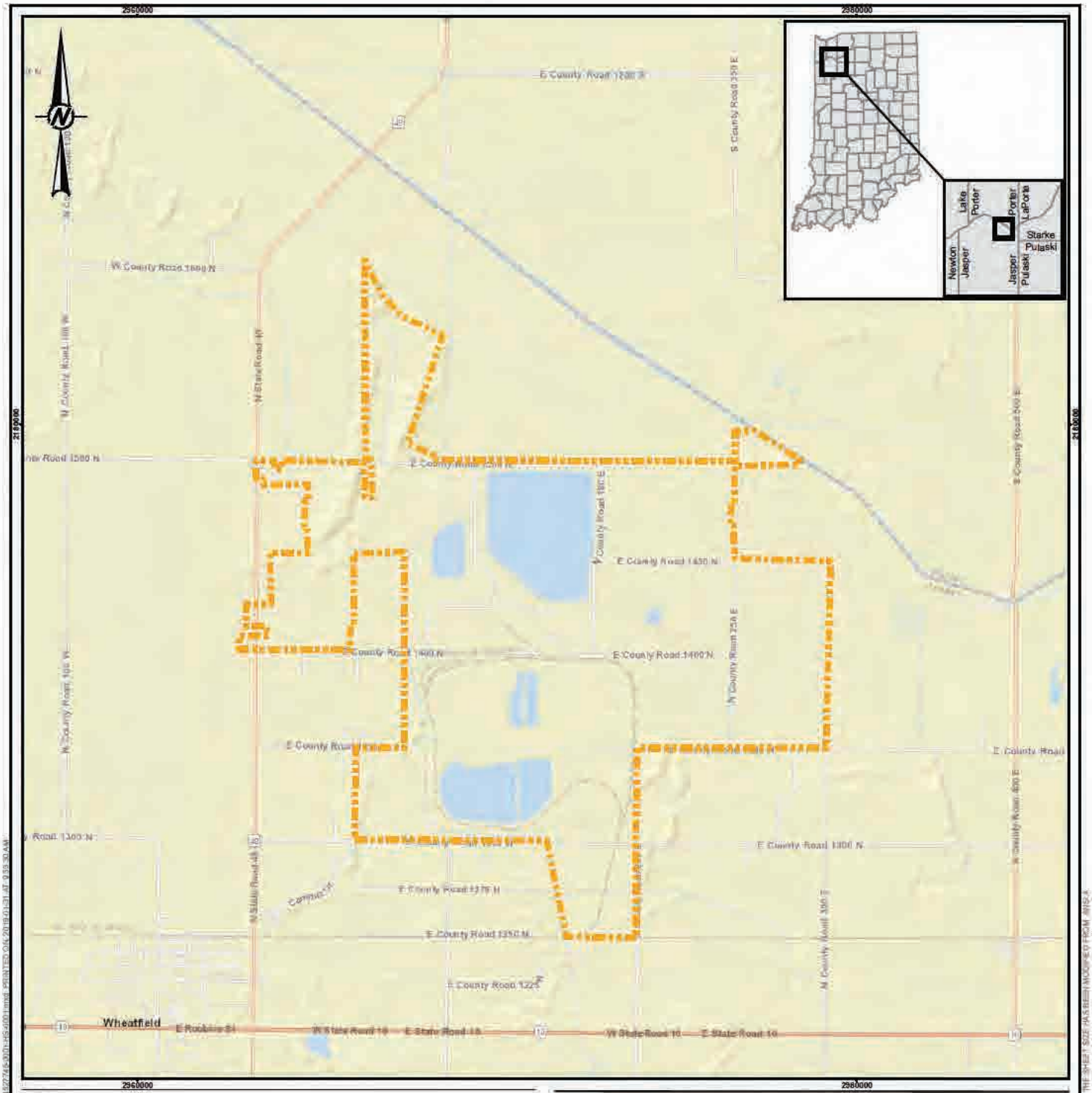
Table : valuation of Groundwater Corrective Measure Alternatives
For Multi-Cell Unit (MSRB, MCWB, and DA)
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

	Corrective Measure Alternatives			
	Alternative A	**Alternative B**	**Alternative C**	**Alternative D**
valuation Criteria	**Monitored natural attenuation**	**ertical barrier hydraulic controls and monitored natural attenuation**	**Pump-and-treat and monitored natural attenuation**	**ertical barrier hydraulic controls, pump-and- treat, and monitored natural attenuation**
Performance	Initial review of site conditions indicates plume stability and confirmation of attenuation and immobili ation, therefore, monitored natural attenuation could be effective in reducing the C C concentrations and mobility. Relative short-term effectiveness varies depending on success of excavation to remove the source material and the low-permeability cap to reduce the mobility of residual C Cs and potential for plume migration. Minimally effective short-term.	ydraulic controls within an existing vertical barrier slurry wall are an effective means of containing the source area. Relatively effective both short-term and long-term.	Groundwater extraction of contaminated groundwater could be potentially effective in reducing volume and mobility of dissolved C Cs in groundwater. Relatively effective both short-term and long-term.	ydraulic controls within an existing vertical barrier slurry wall are an effective means of containing the source area and groundwater extraction of contaminated groundwater downgradient of the barrier could be potentially effective in reducing volume and mobility of dissolved C Cs in groundwater. Relatively effective both short-term and long-term.
Reliability	Moderate to igh. No M re uired, but long-term changes to geochemistry may impact attenuation.	Moderate. Some M re uired and potential treatment replacement.	Moderate, some M re uired and potential treatment replacement.	Moderate, some M re uired and potential treatment replacement.
ase of Implementation	Already occurring.	echnology is common some installation challenges expected based on existing slurry walls and proposed cap.	echnology is common, some installation and drilling challenges expected.	echnology is common some installation challenges expected based on existing slurry walls and proposed cap.
Potential Impacts	Minimal potential for impacts to surface water and off-site groundwater.	ydraulic controls within an existing vertical barrier control cross media impacts outside of the wall. Some safety concerns related to drilling wells and operating treatment plant e.g., regenerating resin .	Groundwater collection and treatment will reduce long-term downgradient cross media impacts. Some safety concerns related to drilling wells and operating treatment plant e.g., regenerating resin .	ydraulic controls within an existing vertical barrier and groundwater collection and treatment have very good control of cross media impacts. Some safety concerns related to drilling wells and operating treatment plant e.g., regenerating resin .
Time Re uirements	Relatively long, no active remediation.	Moderate, should be shorter than MNA alone	Moderate, should be shorter than MNA alone	Moderate, should be shorter than MNA or pump-and-treat alone.
Institutional Re uirements	Low permitting re uirements	May re uire NPDES permit modifications or UIC permit, overall low permitting re uirements	May re uire NPDES permit modifications or UIC permit, overall low permitting re uirements	May re uire NPDES permit modifications or UIC permit, overall low permitting re uirements
Relative Costs	Low Capital, Low M and Replacement	Moderate Capital, Moderate M and Replacement	Moderate Capital, Moderate M and Replacement	Moderate Capital, igh M and Replacement

Prepared by: JBG
Checked by: CMJ
Reviewed by: JBG

GOLDER
MEMBER OF WSP

Figures



LEGEND

Approximate Property Line

0 0.75 1.5

1 " = 0.75 miles Miles

REFERENCE(S)

SERVICE LAYER CREDITS: SOURCES: ESRI, HERE, GARMIN, USGS, NTERMAP, INCREMENT P, NRCAN, ESRI JAPAN, METI, ESRI CH NA (HONG KONG), ESRI KOREA, ESRI (THAILAND), NGCC, © OPENSTREETMAP CONTR BUTORS, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY

PROJECT

NORTHERN INDIANA PUBLIC SERVICE COMPANY
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

SITE LOCATION MAP

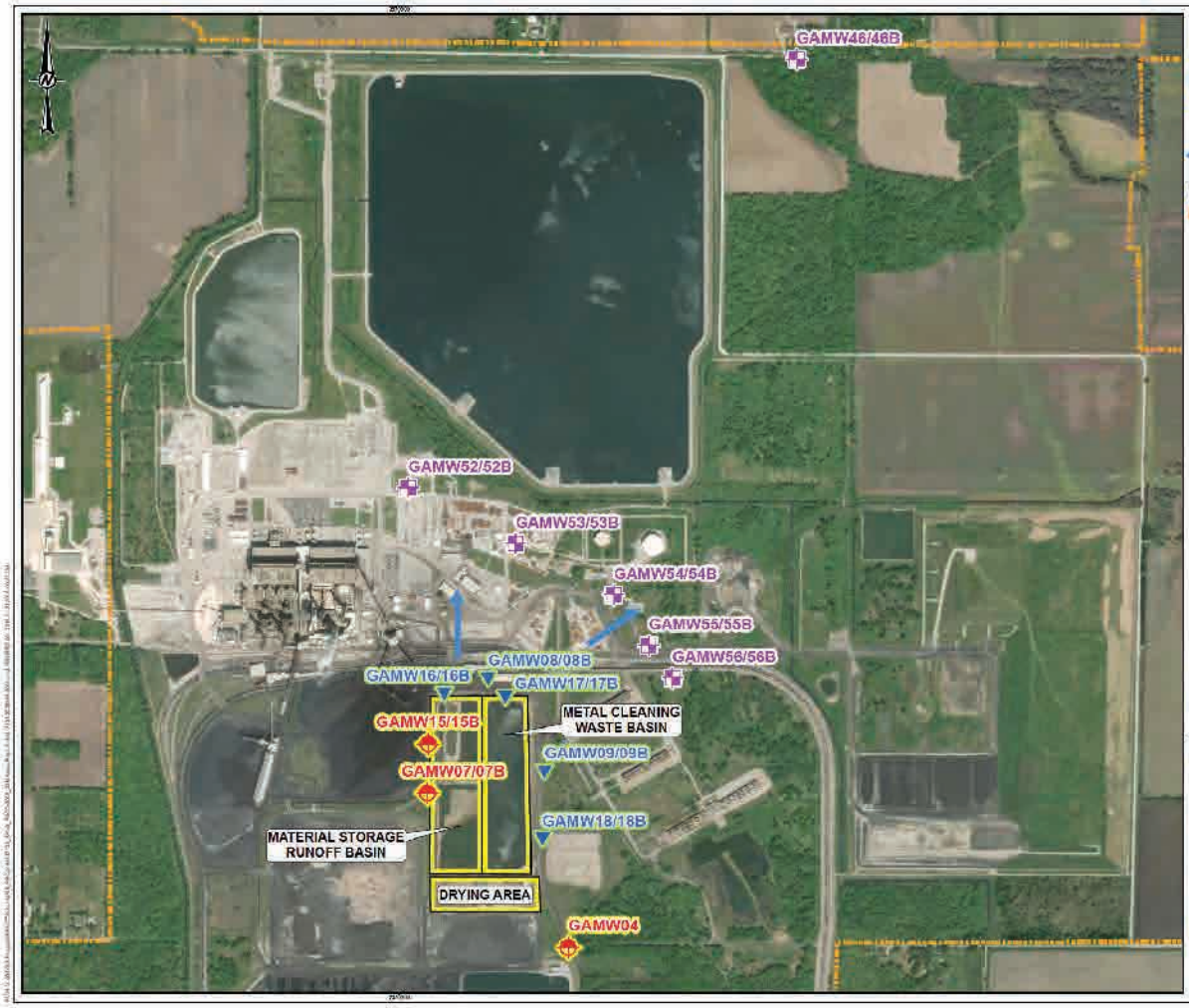
CONSULTANT

GOLDER

YYYY-MM-DD	1/31/2019
DESIGNED	DFS
PREPARED	SHL
REV EWED	JSP
APPROVED	MAH

PROJECT NO	CONTROL	REV.	FIGURE
164817101	A	0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI A



Assessment Monitoring Well
Background Monitoring Well
Downgradient Monitoring Well
Generalized Groundwater Flow Direction
CCR Units
Approximate Property Line

NOTE(S)
1. THIS FIGURE DEPICTS THE GENERALIZED GROUNDWATER FLOW DIRECTION WITHIN THE UPPER PORTION OF THE SURFICIAL AQUIFER.

REFERENCE(S)
1. SOURCE: AERIAL IMAGERY, ESRI ONLINE, ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRID, IGN, AND THE GIS USER COMMUNITY

NORTHERN INDIANA PUBLIC SERVICE COMPANY

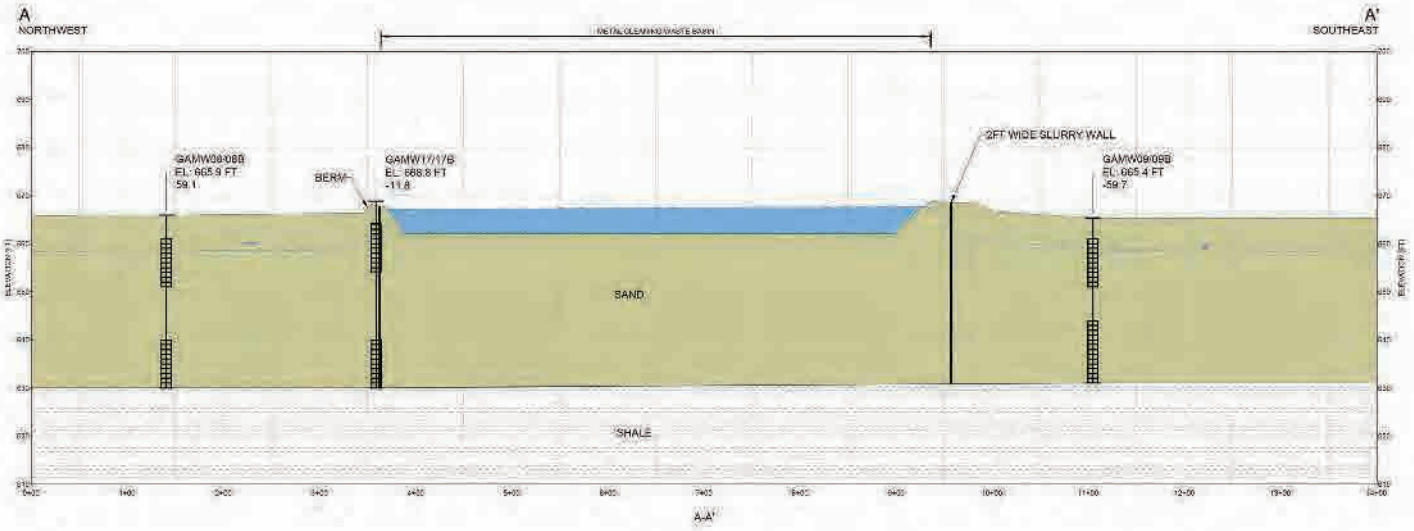
NORTHERN INDIANA PUBLIC SERVICE COMPANY
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

MONITORING WELL LOCATIONS
DRYING AREA, MSRB, AND MCWB

CONSULTANT: GOLDER

DESIGNED	DPS
PREPARED	SIE
REVIEWED	MAH
APPROVED	MWT

PROJECT NO. 164017101 | CONTROL A | REV. 0 | FIGURE 2





VERTICAL SCALE: 1" = 10' (FEET)

HORIZONTAL SCALE: 1" = 50' (FEET)

LEGEND

GAMW-25/25B
EL 663.8
59.1'

- WELL ID
- GROUND SURFACE ELEVATION
- OFFSET DISTANCE
- C/L = CENTERLINE
- GROUNDWATER ELEVATION
- WELL SCREEN
- END OF BORING LOCATION
- IMPOUNDMENT WATER
- SAND
- SHALE

NOTE(S):

1. GEOLOGIC CONTACTS ILLUSTRATED BETWEEN AND BELOW BORINGS ARE INFERRED AND SHOULD NOT BE INTERPRETED AS EXACT INDICATORS OF GEOLOGIC CONDITIONS AT, BETWEEN OR BELOW BORINGS.

CLIENT
NORTHERN INDIANA PUBLIC SERVICE COMPANY

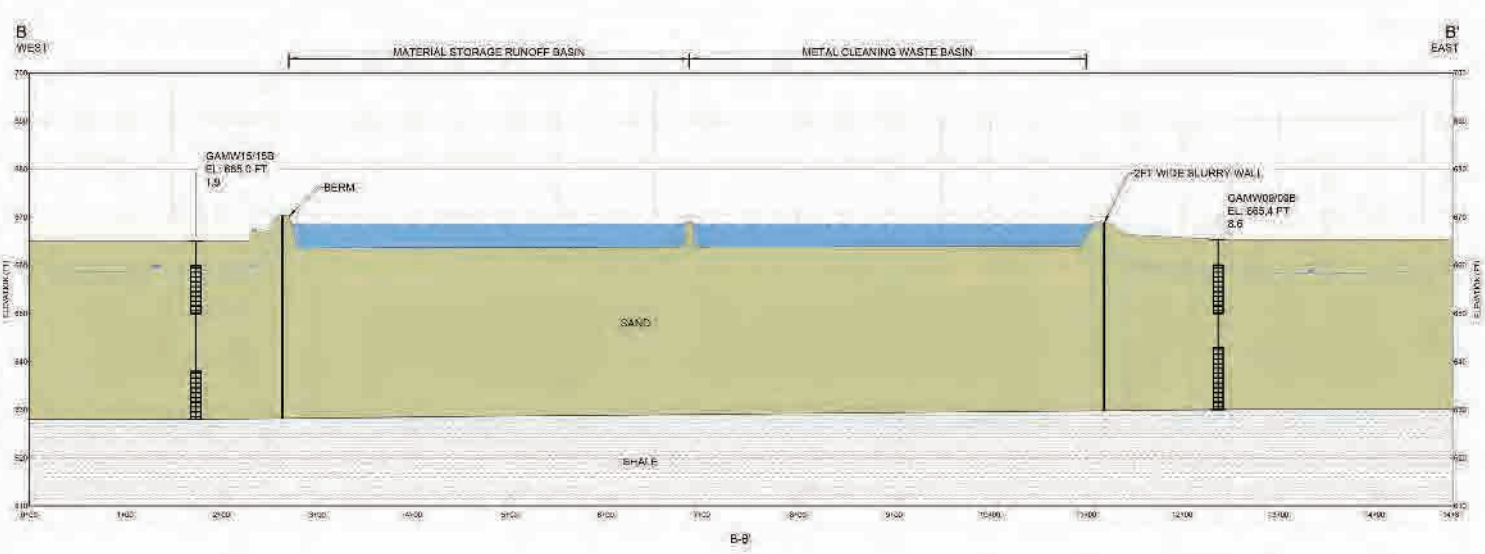
CONSULTANT
GOLDER

YYYY-MM-DD	2019-03-26
DESIGNED	RWC
PREPARED	RWC
REVIEWED	JEG
APPROVED	MAR

PROJECT
NORTHERN INDIANA PUBLIC SERVICE COMPANY
ROLLIN M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE
GEOLOGIC INTERPRETATION
CROSS SECTION A-A'

PROJECT NO.	CONTROL	REV.	FIGURE
1648171	03	0	3


B
WEST
B'
EAST
MATERIAL STORAGE RUNOFF BASIN
METAL CLEANING WASTE BASIN
GAMW15/15D
EL. 665.0 FT
1.9
BERM
2FT WIDE SLURRY WALL
GAMW08/08B
EL. 665.4 FT
8.6
SAND
SHALE
B-B'


GAMW15/15D
GAMW15/15S
GAMW08/08B
GAMW08/08S
GAMW16/16B
GAMW16/16S
GAMW17/17D
GAMW17/17S
GAMW17/17B
GAMW18/18B
GAMW19/19B
GAMW19/19S
GAMW20/20B
GAMW20/20S
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GAMW24/24B
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GAMW35/35S
GAMW36/36B
GAMW36/36S
GAMW37/37B
GAMW37/37S
GAMW38/38B
GAMW38/38S
GAMW39/39B
GAMW39/39S
GAMW40/40B
GAMW40/40S
GAMW41/41B
GAMW41/41S



LEGEND

- Background Monitoring Well
- Downgradient Monitoring Well
- Non-CCR Well
- Surface Water Location
- April 2021 Groundwater Elevation Contour (0.5 ft interval)
- Slurry Wall
- Approximate Property Line
- CCR Units
- Inactive Retired Waste Disposal Basin
- Phase VII

0 800 1,600
1" = 800 feet Feet

NOTE(S)
1. NS INDICATES LOCATION WAS NOT SAMPLED.
2. ( ) INDICATES NOT USED IN CONTOURING.

REFERENCE(S)
1. SURFACE WATER FEATURES SOURCED FROM MAKER ARGYLE CARTOGRAPHICS, UNLESS NOTED OTHERWISE.

CLIENT
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE
MONITORING WELL LOCATIONS AND GROUNDWATER ELEVATION CONTOURS (APRIL 2021)

CONSULTANT
GOLDER
MEMBER OF WSP

TYPED/MAP	2021-07-26
DESIGNED	DPS
PREPARED	TRH
REVIEWED	BMH
APPROVED	MAH

PROJECT NO.	CONTROL	REV.	FIGURE
19431567	A	0	5



0.17 April - May 2020 Boron Concentration (mg/L)

Assessment Monitoring Well

Background Monitoring Well

Downgradient Monitoring Well

April - May 2020 Shallow Boron Contour (mg/L)

Inferred April - May 2020 Shallow Boron Contour (mg/L)

Generalized Groundwater Flow Direction

Slurry Wall

CCR Units

Approximate Property Line

FIGURE NARRATIVE

NOTE(S)

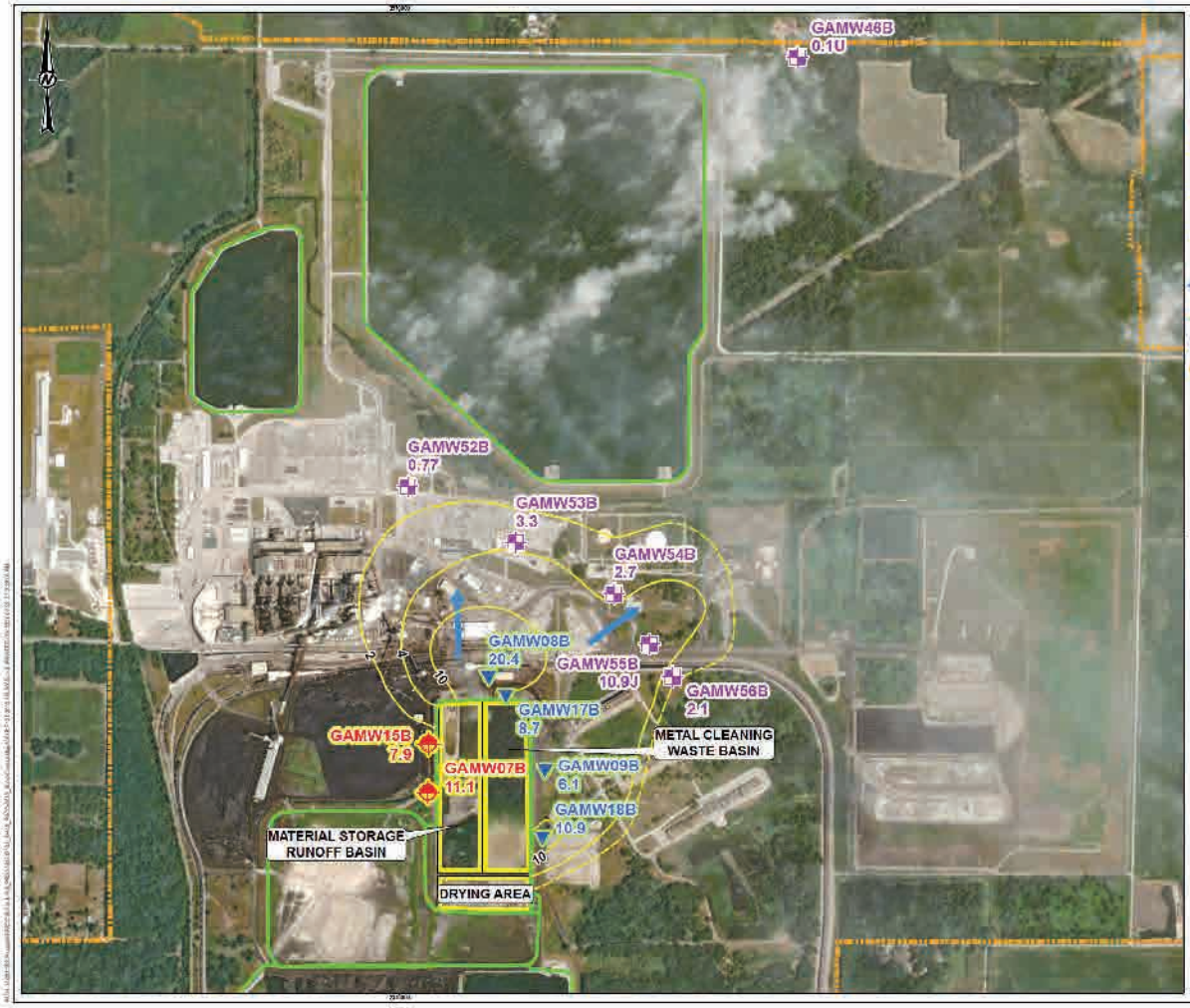
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

ASSESSMENT OF CORRECTIVE MEASURES
BORON ISOCONCENTRATION CONTOUR MAP
APRIL - MAY 2020 (SHALLOW)

GOLDER

PROJECT NO. 20447130 | REV. 0 | FIGURE 6



LEGEND

- 3.1 April - May 2020 Boron Concentration (mg/L)
- Assessment Monitoring Well
- Background Monitoring Well
- Downgradient Monitoring Well
- April - May 2020 Deep Boron Contour (mg/L)
- Inferred April - May 2020 Deep Boron Contour (mg/L)
- Generalized Groundwater Flow Direction
- Slurry Wall
- CCR Units
- Approximate Property Line

0 500 1,000

1" = 500 feet 1 km

FIGURE NARRATIVE

THIS FIGURE SHOWS THE INTERPRETED BORON ISOCONCENTRATION CONTOURS BASED ON GROUNDWATER ANALYTICAL DATA FROM THE APRIL AND MAY 2020 SAMPLING EVENTS FOR SITE-WIDE ASSESSMENT WITHIN THE SURFICIAL AQUIFER. THE ISOCONCENTRATION CONTOURS ARE INTENDED TO DEPICT THE INFERRED DISTRIBUTION OF BORON IN GROUNDWATER ON THE BASIS OF THE DATA ILLUSTRATED. THE DISTRIBUTION IS LIKELY MORE HETEROGENEOUS THAN SHOWN AND THE ACTUAL CONDITIONS WILL VARY. IN SOME LOCATIONS ARE POSSIBLE BORON DISTRIBUTION IN GROUNDWATER IS UNKNOWN WITH THE MONITORING NETWORK.

NOTE(S)

1. THE FIGURE DEPICTS THE GENERALIZED GROUNDWATER FLOW DIRECTION WITHIN THE DEEPER PORTION OF THE SURFICIAL AQUIFER.
2. ALL VALUES SHOWN ARE IN MILLIGRAMS PER LITER (MG/L).

REFERENCE(S)

1. ESRI 2021. ARCGIS ONLINE: WORLD IMAGERY. ACCESSED: [DATE]. SOURCES OF IMAGERY AND DATA INCLUDE MAXAR, [REDACTED], AND THE GIS USER COMMUNITY.

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

ASSESSMENT OF CORRECTIVE MEASURES
BORON ISOCONCENTRATION CONTOUR MAP
APRIL - MAY 2020 (DEEP)

CONSULTANT

GOLDER

DESIGNED	KC
PREPARED	TBH
REVIEWED	DEA
APPROVED	MW

PROJECT NO. 20447130 | CONTROL A | REV. 0 | FIGURE 7

APPENDIX A

Volume Calculations

VOLUME CALCULATIONS

Volume of impacted material below the CCR Unit

Assumptions:

Entire remaining volume of water within the slurry walls after excavation is impacting.
Area is estimated by the combined area of the three impoundments (Figure 6).
Depth is estimated by the approximate saturated thickness outside the slurry walls (Figure 3).

Area	36.2	acre	(A)	(Wood 2019)
Saturated depth	32	feet	(D)	(Golder 2017)

Estimated volume of impacted material was calculated using the following formula:

$Volume = A*D = V_1$ 1 acre= 43560 ft^2

V_1	1158	acre-ft
V_1	5.0E+07	ft^3

Volume of impacted material downgradient of the CCR Unit

Assumptions:

The volume is estimated by the volume with boron concentrations greater than 4 mg/L.
Plume areas are calculated based on the 4 mg/L contours displayed on Figure 6 and Figure 7.

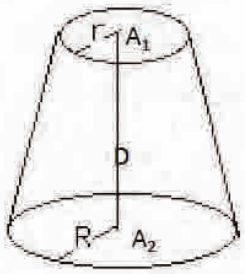
Shallow plume area	21.75	acre		
	9.474E+05	ft^2	(A1)	
Deep plume area	87.40	acre		
	3.807E+06	ft^2	(A2)	
Saturated depth	32	feet	(D)	(Golder 2017)
Assumed effective porosity	0.3		(n)	(Golder 2017)

The plume area were approximated as circles, and the volume of impacted material was estimated as a frustrum using the following formula:

$Volume = \pi*D/3*(R^2 + Rr + r^2) = V_2$

$r = (A_1/\pi)^{1/2}$, $R = (A_2/\pi)^{1/2}$

r	549.2	ft
R	1101	ft
V_2	7.10E+07	ft^3
V_2	1629	acre-ft



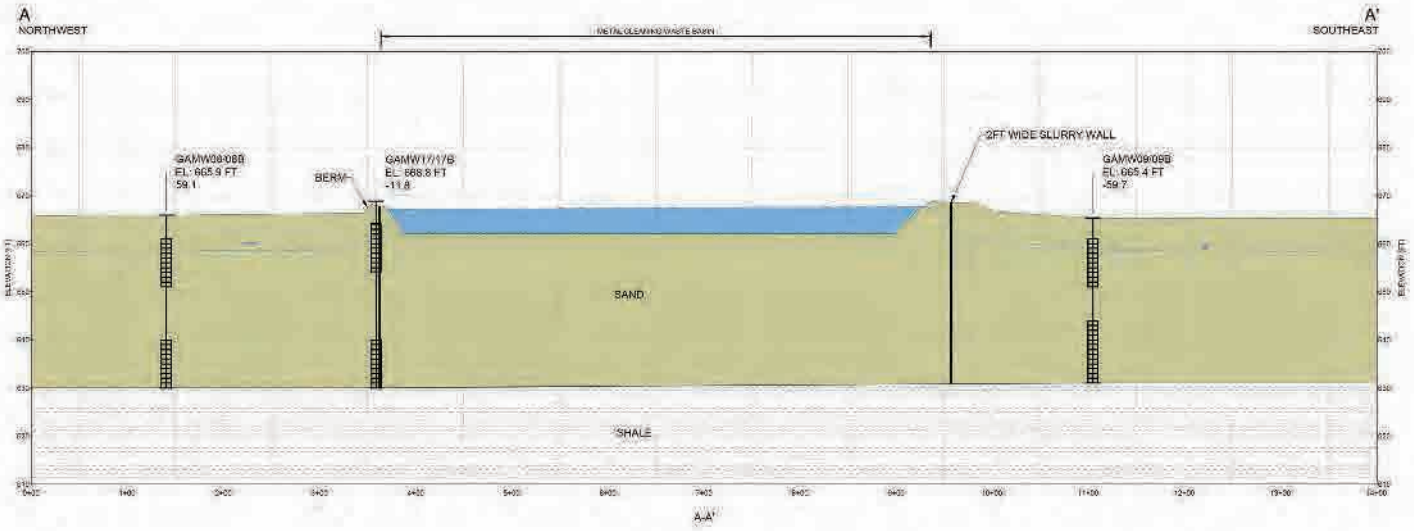
Estimated volume of impacted groundwater was calculated using the following forumula:

$Volume = V_2*n = V_{water}$

V_{water}	2.13E+07	ft^3
V_{water}	1.59E+08	gallons

Prepared by: DFS
Checked by: BPC
Reviewed by: JBG

Golder Associates, Groundwater Monitoring Program Implementation Manual, October 2017
Wood, 2019. Multi-Cell Unit Surface Impoundments (CCR Final Rule) Draft Closure Application. March 8, 2019.





VERTICAL SCALE: 1" = 10' (0, 10, 20 FEET)

HORIZONTAL SCALE: 1" = 50' (0, 50, 100 FEET)

LEGEND

- GAMW-25-03B — EL. 663.8, 59.1 — WELL ID, GROUND SURFACE ELEVATION, OFFSET DISTANCE, C/L = CENTERLINE
- GROUNDWATER ELEVATION
- WELL SCREEN
- END OF BORING LOCATION
- IMPOUNDMENT WATER
- SAND
- SHALE

NOTE(S):

1. GEOLOGIC CONTACTS ILLUSTRATED/OBTAINED BELOW BORINGS ARE INFERRED AND SHOULD NOT BE INTERPRETED AS EXACT INDICATORS OF GEOLOGIC CONDITIONS AT, BETWEEN OR BELOW BORINGS.

CLIENT: NORTHERN INDIANA PUBLIC SERVICE COMPANY

CONSULTANT: GOLDER

YYYY-MM-DD	2019-02-26
REVISED	RWO
PREPARED	RWO
REVIEWED	
APPROVED	

PROJECT: NORTHERN INDIANA PUBLIC SERVICE COMPANY
ROLLIN M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE: **GEOLOGIC INTERPRETATION**
CROSS SECTION A-A'

PROJECT NO.	CONTROL	REV.	FIGURE
1648171	03	0	3



0.17 October 2018 Boron Concentration (mg/L)

Assessment Monitoring Well

Background Monitoring Well

Downgradient Monitoring Well

October 2018 Shallow Boron Contour (mg/L)

Generalized Groundwater Flow Direction

Slurry Wall

CCR Units

Approximate Property Line

FIGURE NARRATIVE

NOTES:

NORTHERN INDIANA PUBLIC SERVICE COMPANY

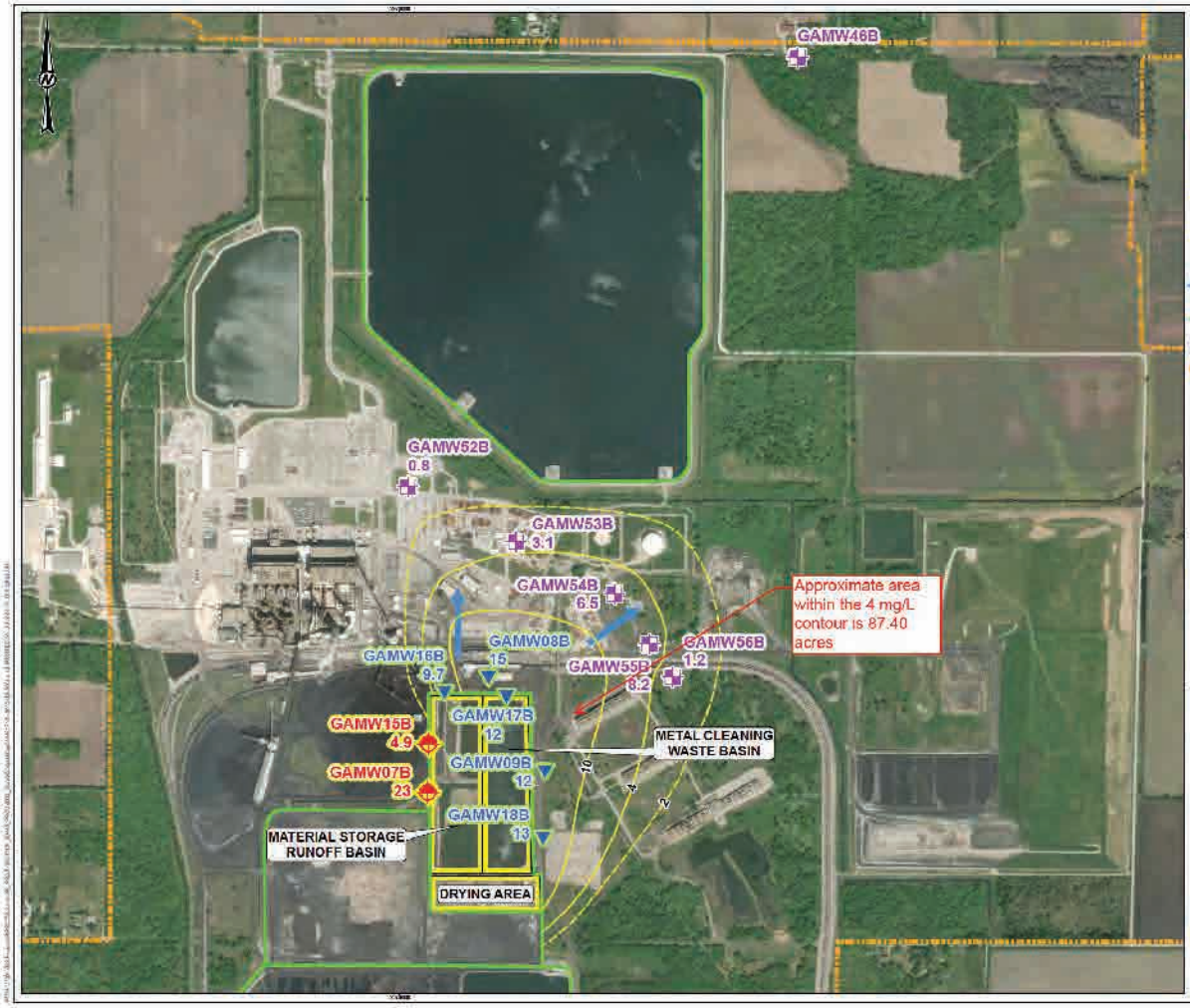
NORTHERN INDIANA PUBLIC SERVICE COMPANY
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

ASSESSMENT OF CORRECTIVE MEASURES
BORON ISOCONCENTRATION CONTOUR MAP
OCTOBER 2018 (SHALLOW)

GOLDER

DESIGNED: DFS
PREPARED: SHL
REVIEWED: MAH
APPROVED: MAH

PROJECT NO: 1648(1710)
DATE/REV: A
REV: 0
FIGURE: 6



LEGEND

- 3.1 October 2018 Boron Concentration (mg/L)
- Assessment Monitoring Well
- Background Monitoring Well
- Downgradient Monitoring Well
- October 2018 Deep Boron Contour (mg/L)
- Inferred October 2018 Deep Boron Contour (mg/L)
- Generalized Groundwater Flow Direction
- Slurry Wall
- CCR Units
- Approximate Property Line

FIGURE NARRATIVE

THIS FIGURE SHOWS THE INTERPRETED BORON ISOCONCENTRATION CONTOURS BASED ON GROUNDWATER ANALYTICAL DATA FROM THE DEEPER WATER-BEARING UNIT FOR SITE WITH A DETECTION MONITORING SYSTEM. ADDITIONALLY, THE ISOCONCENTRATION CONTOURS ARE INTENDED TO DEPICT THE INTERPRETED DISTRIBUTION OF BORON IN GROUNDWATER ON THE BASIS OF THE DATA ILLUSTRATED. THE DISTRIBUTION IS LIKELY MORE HETEROGENEOUS THAN SHOWN, AND THE ACTUAL CONDITIONS WILL VARY OTHER INTERPRETATIONS ARE POSSIBLE. BORON DISTRIBUTION IN GROUNDWATER IS KNOWN TO VARY WITH TIME.

THE WELLS DETECTED IN GAMW 07B AND GAMW 15B ARE NOT CONTOURED IN THIS MAP BASED ON INTERPRETATION IN THAT THESE CONCENTRATIONS ARE DUE TO UPGRADIENT INFLUENCE.

NOTE(S)

1. THIS FIGURE DEPICTS THE GENERALIZED GROUNDWATER FLOW DIRECTION WITHIN THE DEEPER PORTION OF THE SHALLOW AQUIFER.
2. ALL VALUES ARE REPORTED IN MILLIGRAMS PER LITER (MG/L).

REFERENCE(S)

1. DERIVED FROM SOURCES SUCH AS ESRI, USGS, NOAA, DELORME, GEOEYE, DIGITALGLOBE, AND THE GIS USER COMMUNITY.

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY

PROJECT

NORTHERN INDIANA PUBLIC SERVICE COMPANY
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

ASSESSMENT OF CORRECTIVE MEASURES
BORON ISOCONCENTRATION CONTOUR MAP
OCTOBER 2018 (DEEP)

CONSULTANT

GOLDER

DESIGNED	DFS
PREPARED	SHL
REVIEWED	BDH
APPROVED	MAH

PROJECT NO.	CONTROL	REV.	FIGURE
1648(1710)	A	0	7

APPENDIX B

Slug Test Data and Calculations

Appendix B
HYDRAULIC CONDUCTIVITY TESTING RESULTS

Well	Date	Screened Interval	Type	Test Duration	Test Number	Hvorslev Method		Bouwer and Rice Method		van der Kamp Method		Hvorslev/Bouwer and Rice Arithmetic Mean	
						cm/sec	ft/day	cm/sec	ft/day	cm/sec	ft/day	cm/sec	ft/day
GAMW03	7/7/2016	5-15	Transducer (Rising)	<2 min	1	7.44E-03	2.11E+01	4.99E-03	1.42E+01	n/a	n/a	6.22E-03	1.77E+01
					2	7.45E-03	2.11E+01	5.22E-03	1.48E+01	n/a	n/a	6.34E-03	1.80E+01
GAMW13	7/7/2016	5-15	Transducer (Rising)	<2 min	1	5.75E-02	1.63E+02	3.91E-02	1.11E+02	n/a	n/a	4.83E-02	1.37E+02
					2	6.50E-02	1.84E+02	4.81E-02	1.36E+02	n/a	n/a	5.66E-02	1.60E+02
GAMW15	7/7/2016	5-15	Transducer (Rising)	<2 min	1	2.59E-02	7.34E+01	1.63E-02	4.63E+01	n/a	n/a	2.11E-02	5.99E+01
					2	1.11E-02	3.15E+01	1.08E-02	3.05E+01	n/a	n/a	1.10E-02	3.10E+01
GAMW19	7/7/2016	6-16	Transducer (Rising)	<2 min	1	3.70E-02	1.05E+02	2.25E-02	6.38E+01	n/a	n/a	2.98E-02	8.44E+01
					2	1.01E-01	2.87E+02	6.85E-02	1.94E+02	n/a	n/a	8.48E-02	2.41E+02
Average Shallow (515 ftbgs)						**3.90E-02**	**1.11E+02**	**2.69E-02**	**7.63E+01**	**n/a**	**n/a**	**3.30E-02**	**9.35E+01**
GAMW03B	7/6/2016	27-37	Transducer (Falling)	<2 min	1	6.78E-03	1.92E+01	5.81E-03	1.65E+01	n/a	n/a	6.30E-03	1.79E+01
					2	4.30E-03	1.22E+01	4.79E-03	1.36E+01	n/a	n/a	4.55E-03	1.29E+01
			Transducer (Rising)	<2 min	1	5.65E-03	1.60E+01	6.42E-03	1.82E+01	n/a	n/a	6.04E-03	1.71E+01
					2	1.47E-02	4.16E+01	1.25E-02	3.55E+01	1.49E-02	4.22E+01	1.36E-02	3.86E+01
GAMW13B	7/7/2016	25-35	Transducer (Falling)	<2 min	1	8.48E-03	2.40E+01	9.27E-03	2.63E+01	n/a	n/a	8.88E-03	2.52E+01
					2	8.09E-03	2.29E+01	9.27E-03	2.63E+01	n/a	n/a	8.68E-03	2.46E+01
			Transducer (Rising)	<2 min	1	1.11E-02	3.15E+01	1.16E-02	3.30E+01	2.73E-02	7.74E+01	1.14E-02	3.23E+01
					2	1.06E-02	3.00E+01	1.08E-02	3.06E+01	1.06E-02	3.01E+01	1.07E-02	3.03E+01
GAMW15B	7/7/2016	27.7-37.7	Transducer (Falling)	<2 min	1	4.50E-03	1.28E+01	3.45E-03	9.79E+00	n/a	n/a	3.98E-03	1.13E+01
					2	1.03E-02	2.91E+01	8.75E-03	2.48E+01	9.53E-03	2.70E+01	9.53E-03	2.70E+01
			Transducer (Rising)	<2 min	1	1.17E-02	3.32E+01	1.06E-02	3.02E+01	1.24E-02	3.50E+01	1.12E-02	3.17E+01
					2	1.06E-02	3.02E+01	9.79E-03	2.77E+01	1.69E-02	4.80E+01	1.02E-02	2.90E+01
GAMW19B	7/7/2016	23-33	Transducer (Falling)	<2 min	1	1.37E-02	3.88E+01	1.44E-02	4.09E+01	n/a	n/a	1.41E-02	3.99E+01
					2	6.82E-03	1.93E+01	6.31E-03	1.79E+01	n/a	n/a	6.57E-03	1.86E+01
			Transducer (Rising)	<2 min	1	1.84E-02	5.21E+01	1.83E-02	5.18E+01	1.29E-02	3.67E+01	1.84E-02	5.20E+01
					2	1.21E-02	3.43E+01	1.03E-02	2.91E+01	1.21E-02	3.43E+01	1.12E-02	3.17E+01
Average Deep (2535 ftbgs)						**9.86E-03**	**2.80E+01**	**9.52E-03**	**2.70E+01**	**1.46E-02**	**4.13E+01**	**9.69E-03**	**2.75E+01**

Notes:
ft/day = feet per day
cm/sec = centimeters per second
n/a = not analyzed

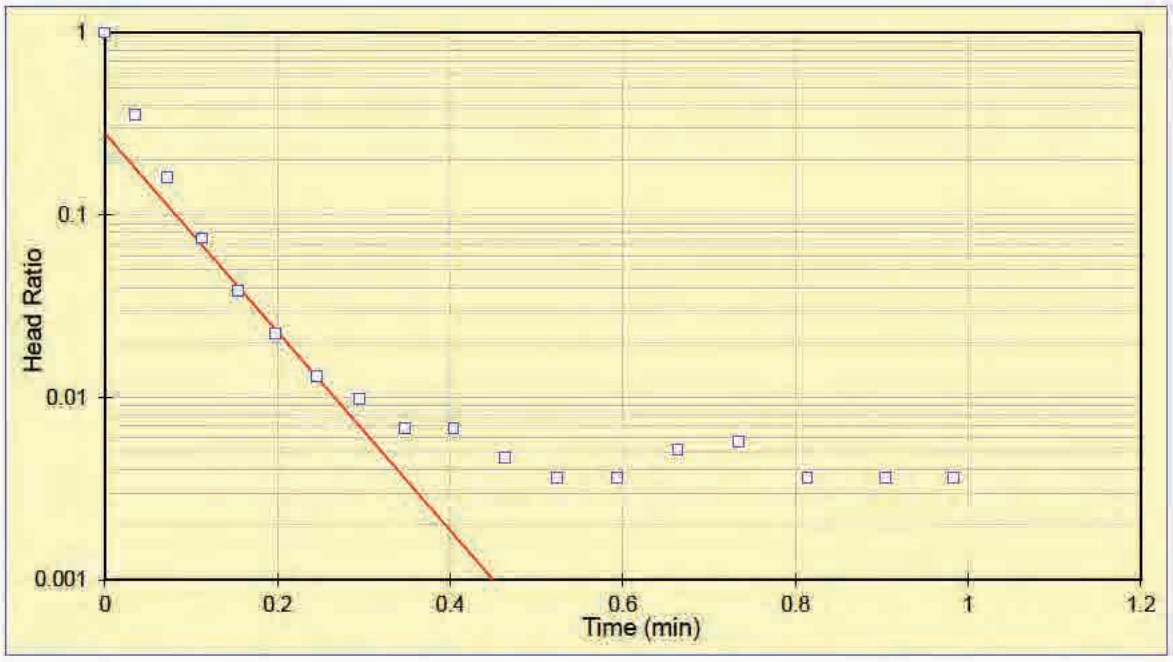
Prepared by: DFS
Checked by: KMC
Reviewed by: MAH

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	7.44E-03	cm/sec
t_1 =	0	K=	2.11E+01	ft/day
t_2 =	0.45			
h_1/h_0 =	0.28			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/25/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

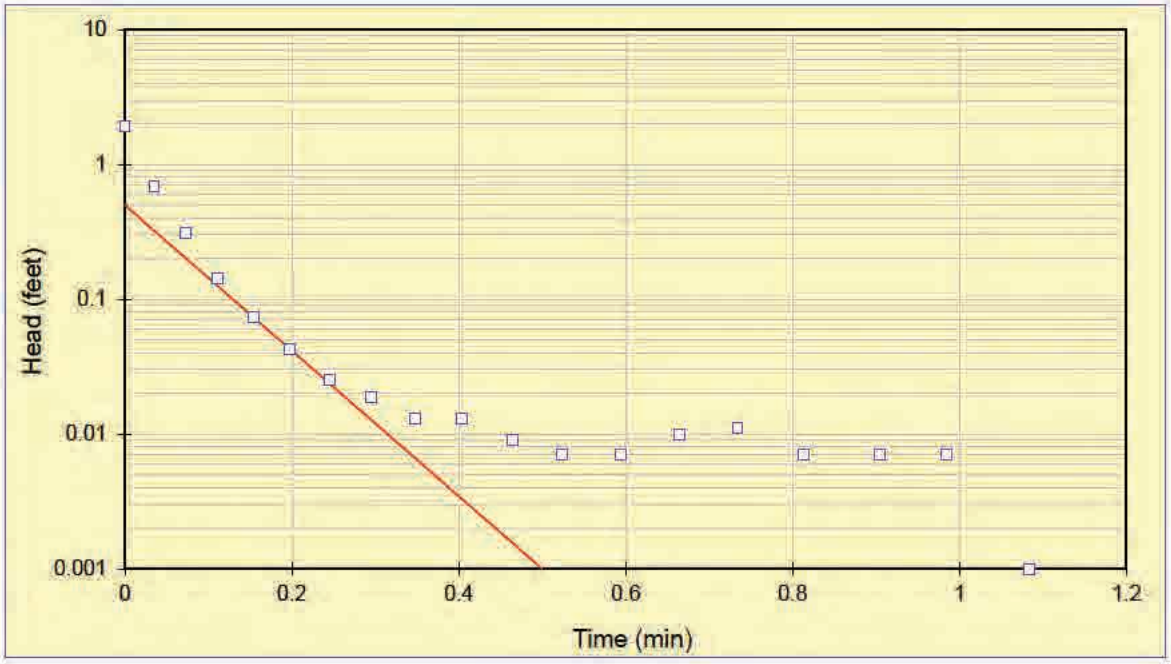
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.28
y_0 =	0.50
y_t =	0.001
t =	0.5

RESULTS

K=	4.99E-03	cm/sec
K=	1.42E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

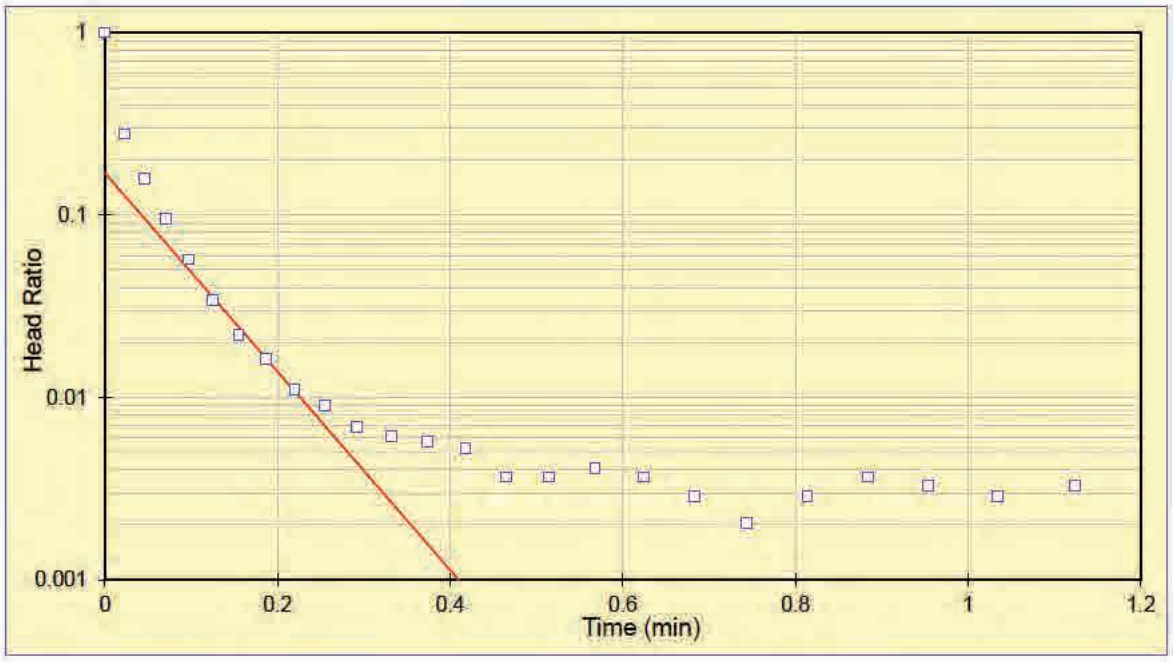
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	7.45E-03	cm/sec
t_1 =	0	K=	2.11E+01	ft/day
t_2 =	0.41			
h_1/h_0 =	0.17			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

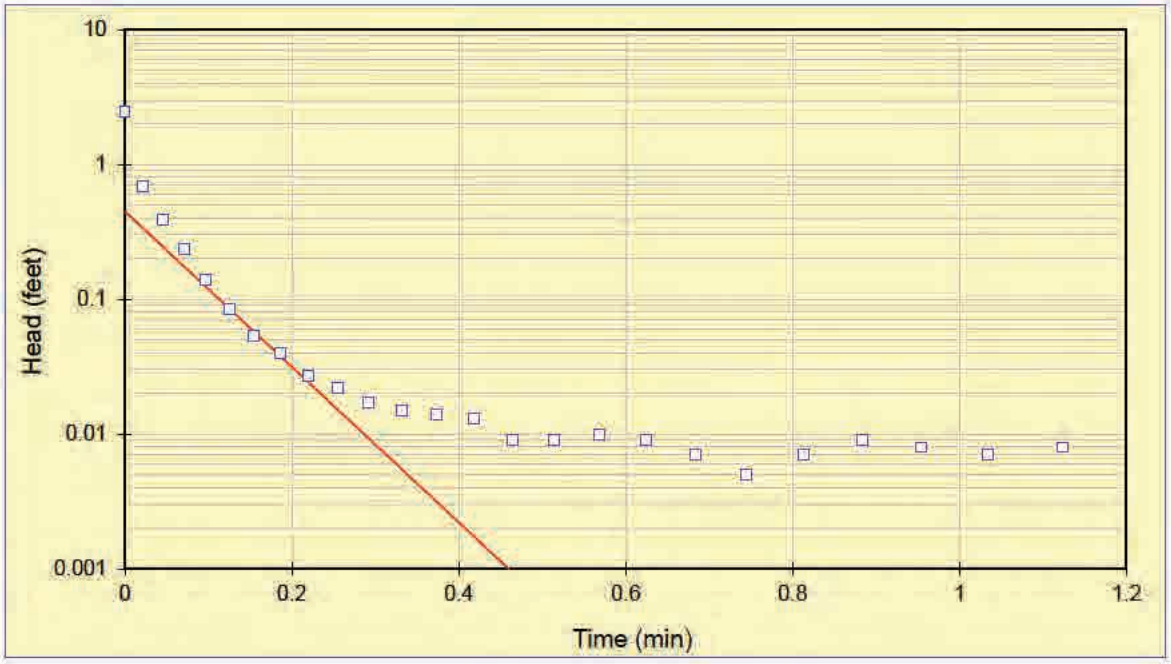
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.23
y_0 =	0.45
y_t =	0.001
t =	0.5

RESULTS

K=	5.22E-03	cm/sec
K=	1.48E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

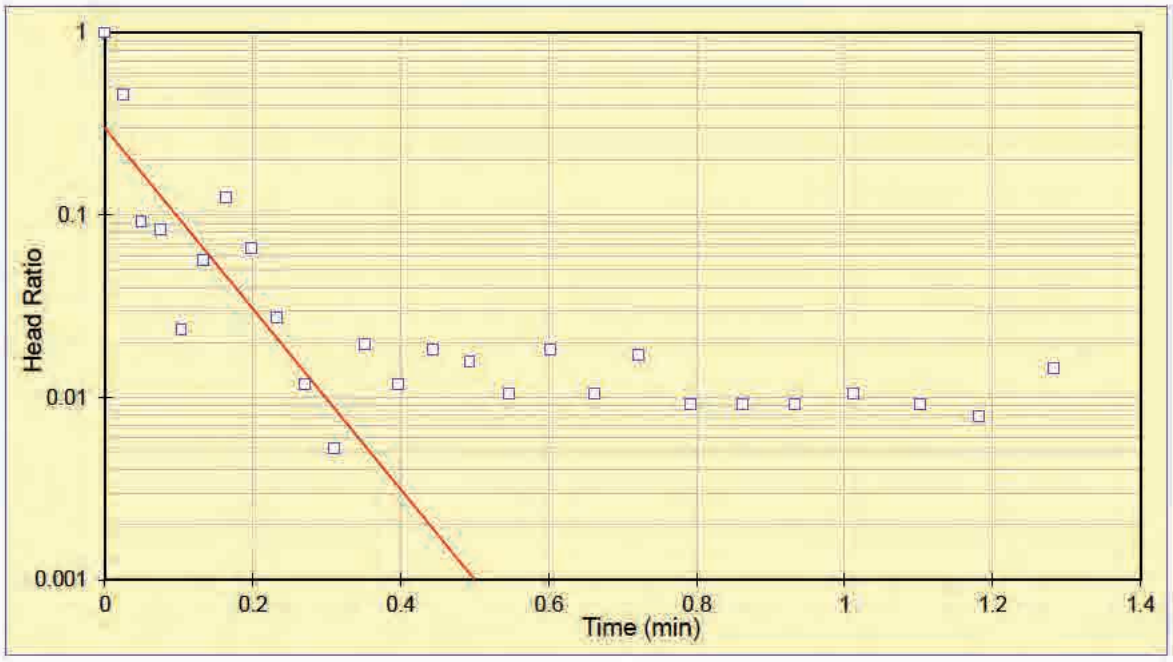
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-03B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	6.78E-03	cm/sec
t_1 =	0	K=	1.92E+01	ft/day
t_2 =	0.5			
h_1/h_0 =	0.30			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-03B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

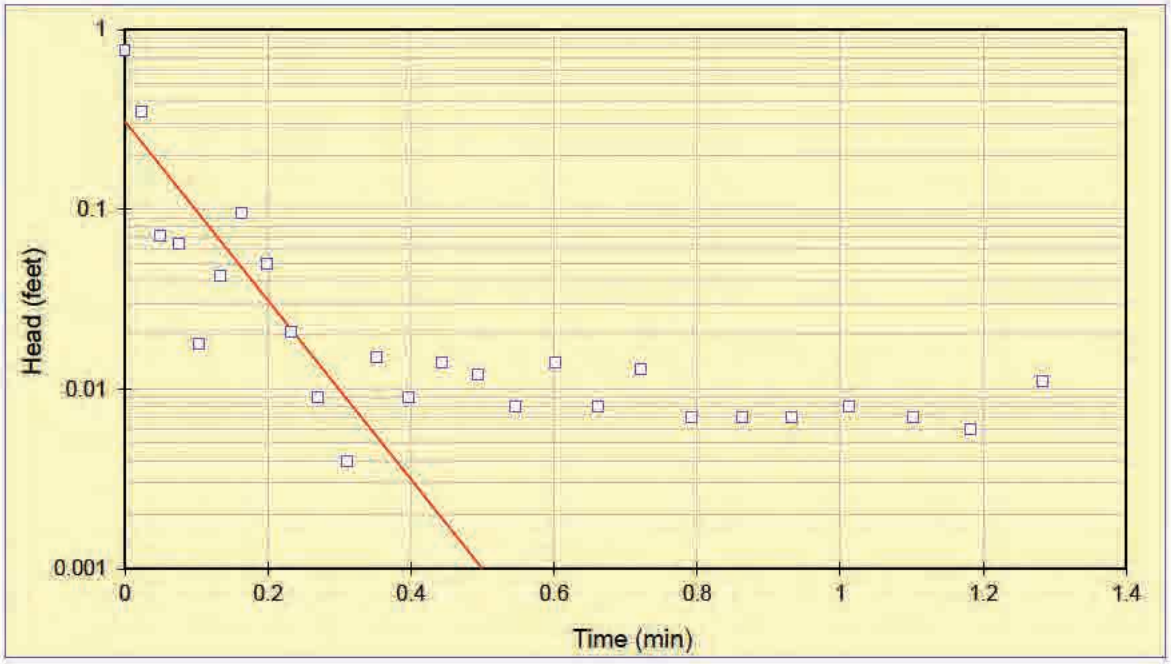
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.87
y_0 =	0.31
y_t =	0.001
t =	0.5

RESULTS

K=	5.81E-03	cm/sec
K=	1.65E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

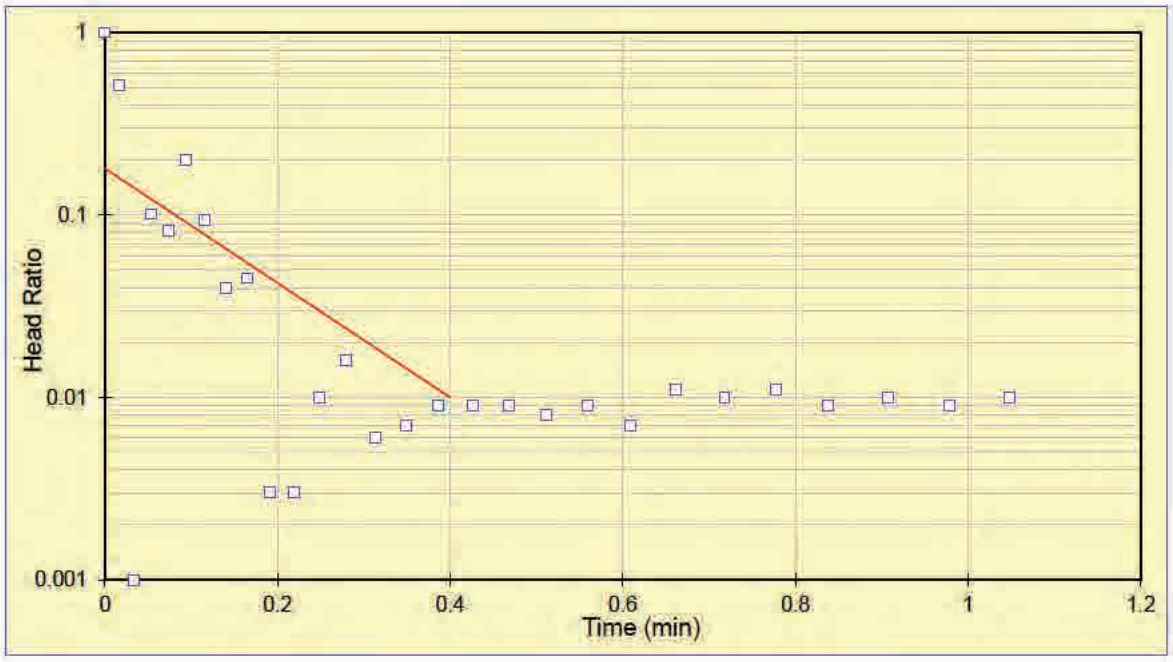
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-03B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	4.30E-03	cm/sec
t_1 =	0	K=	1.22E+01	ft/day
t_2 =	0.4			
h_1/h_0 =	0.18			
h_2/h_0 =	0.01			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-03B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

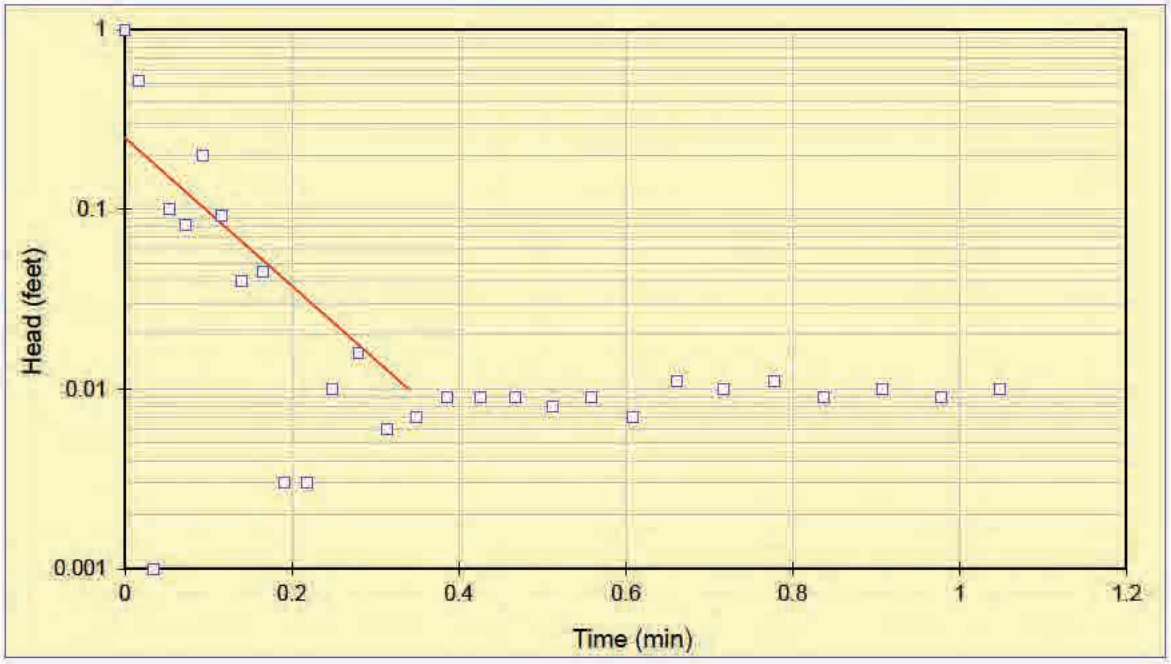
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.87
y_0 =	0.25
y_t =	0.010
t =	0.3

RESULTS

K=	4.79E-03	cm/sec
K=	1.36E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

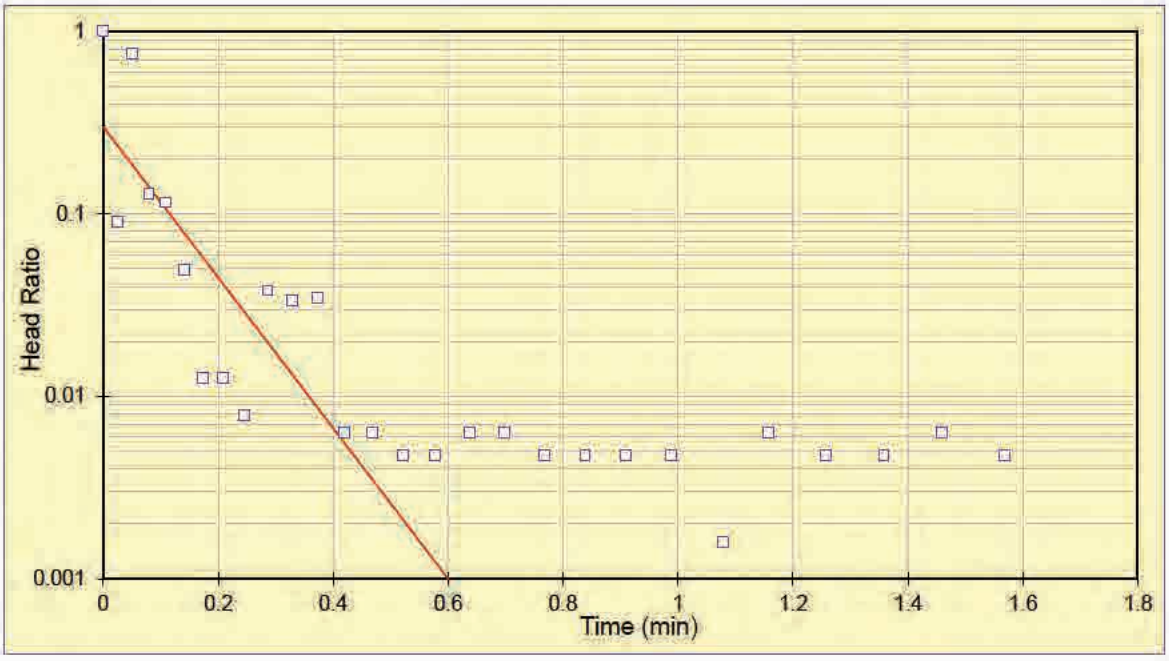
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	5.65E-03	cm/sec
t_1 =	0	K=	1.60E+01	ft/day
t_2 =	0.6			
h_1/h_0 =	0.30			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

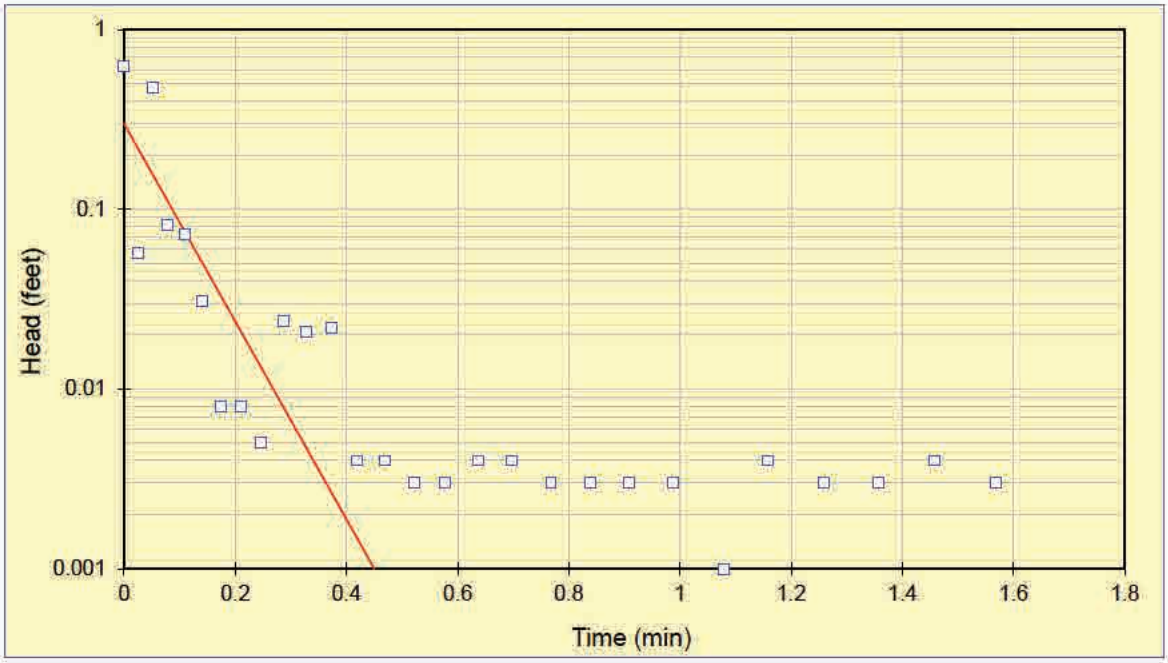
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.87
y_0 =	0.30
y_t =	0.001
t =	0.5

RESULTS

K=	6.42E-03	cm/sec
K=	1.82E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS

UNDERDAMPED SLUG TEST GAMW-03B (TEST 2)

$$T = b + a \ln T$$

where:

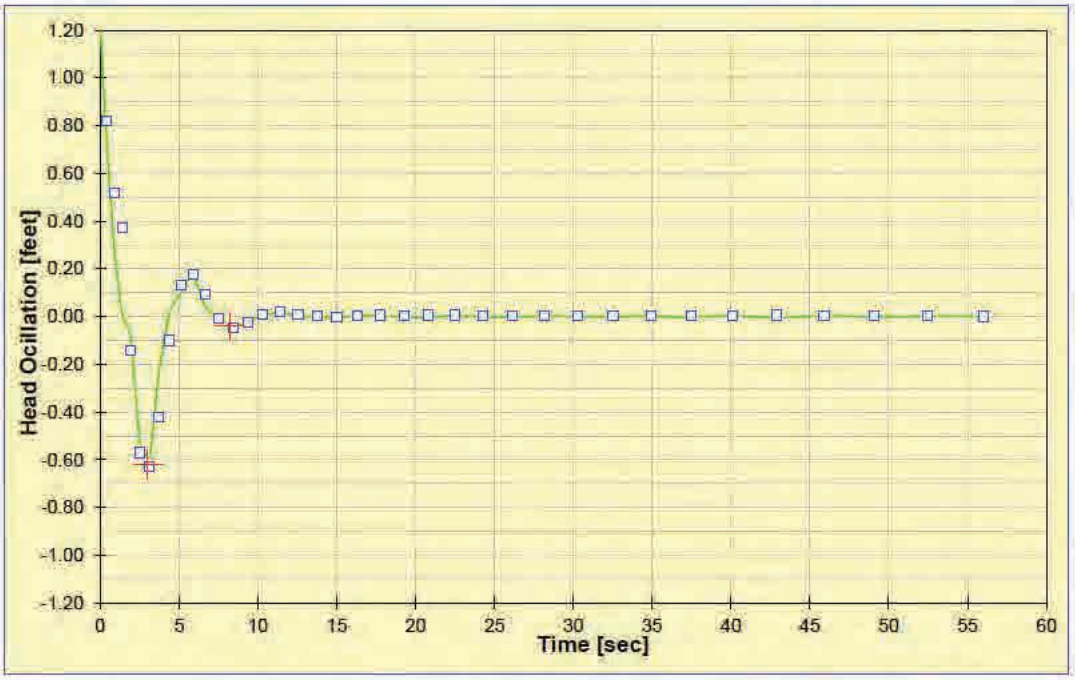
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma / (g/L)^{1/2}$$
$$L = g/(\omega^2 + \gamma^2)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.31826	ft^2
r_s =	0.08	ft	d =	0.3998	ft^{-1}
L_c =	19.62	ft	a =	0.00286	ft^3
L_s =	10.00	ft	t_1 =	3.00	sec
ω =	1.2083	ft^{-1}	t_2 =	8.20	sec
γ =	0.5271	ft^{-1}	$h(t_1)$ =	0.62	ft
L =	18.52	ft^3/sec^2	$h(t_2)$ =	0.04	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.73E-02 ft^2/sec	α < 0.1?	YES
T =	1.53E-02 ft^2/sec	d < 0.7?	YES
T =	1.32E+03 ft^2/day	L_1 =	18.52
K =	4.22E+01 ft/day	L_2 =	24.62
K =	1.49E-02 cm/sec	L_1:L_2 Diff <20% ?	NO



Project Name: NIPSCO RMSGS
Project No.: 164-8171
Test Date: 07/08/16

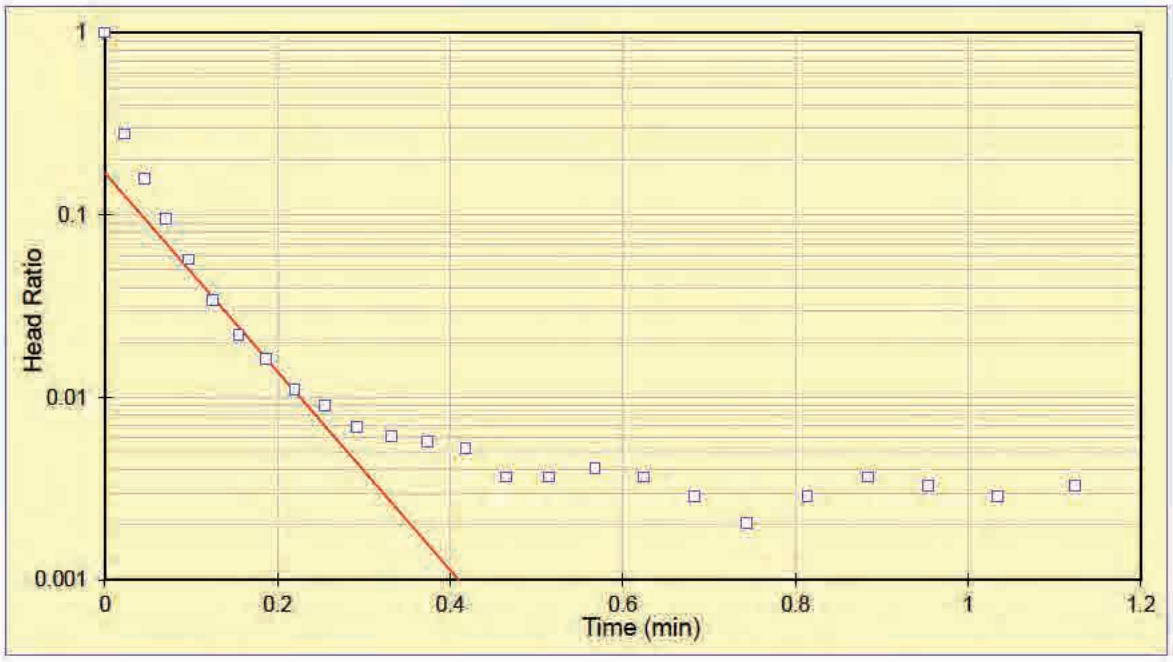
Analysis By: DFS
Checked By: JRS
Analysis Date: 8/8/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	7.45E-03	cm/sec
t_1 =	0	K=	2.11E+01	ft/day
t_2 =	0.41			
h_1/h_0 =	0.17			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

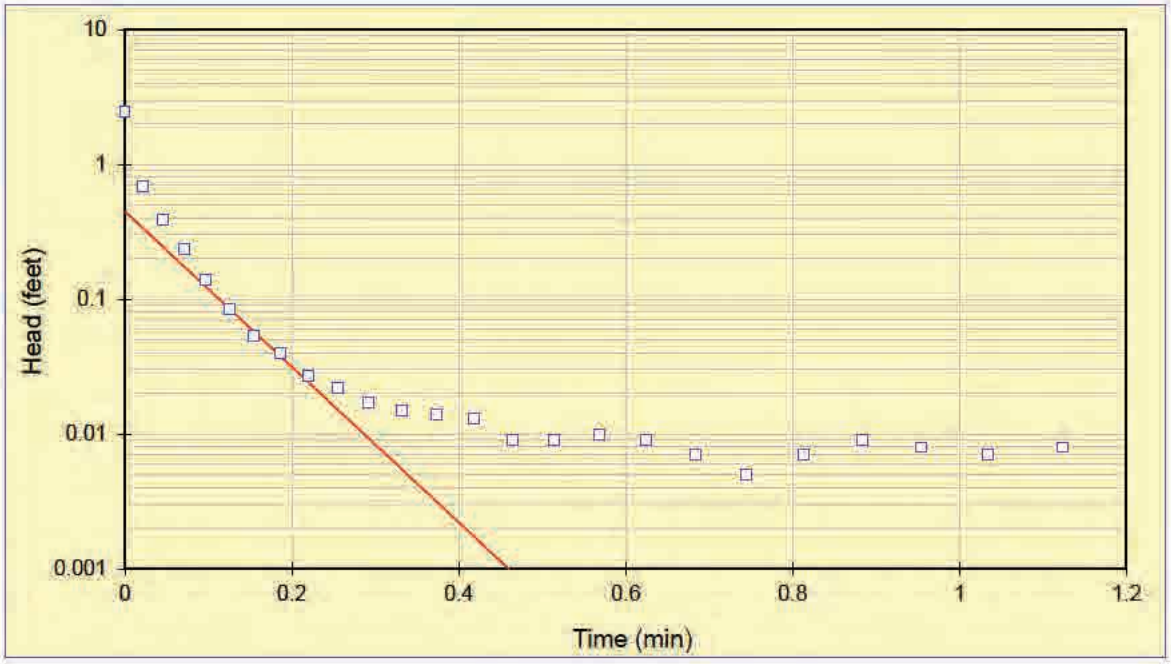
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.23
y_0 =	0.45
y_t =	0.001
t =	0.5

RESULTS

K=	5.22E-03	cm/sec
K=	1.48E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

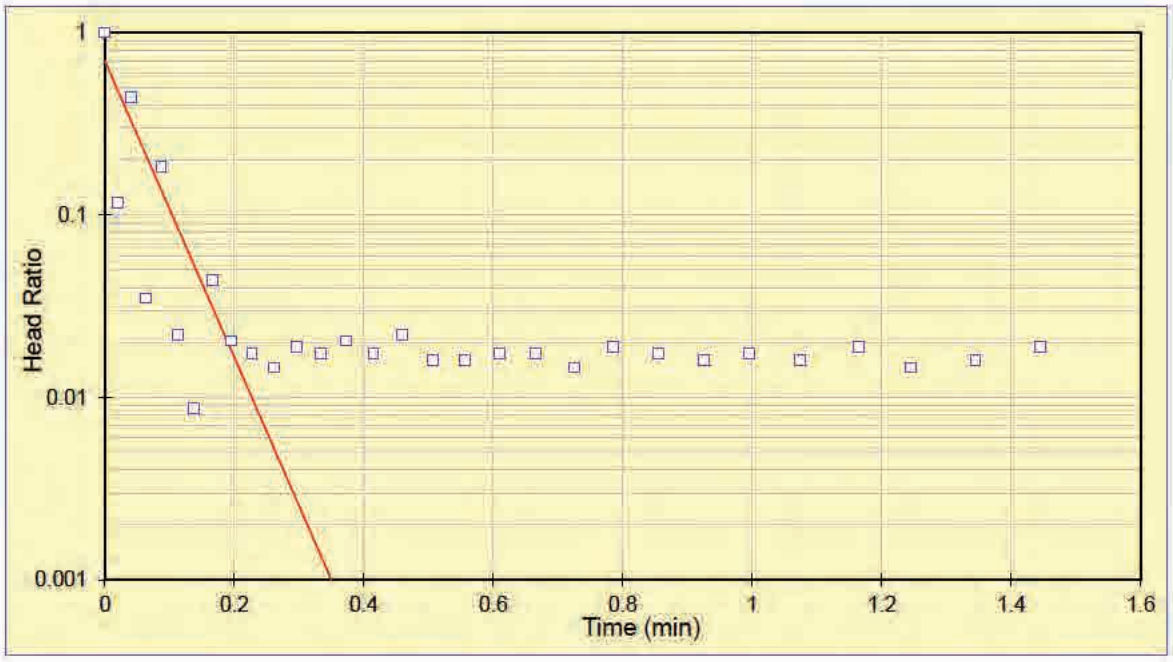
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.11E-02	cm/sec
t_1 =	0	K=	3.15E+01	ft/day
t_2 =	0.35			
h_1/h_0 =	0.70			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

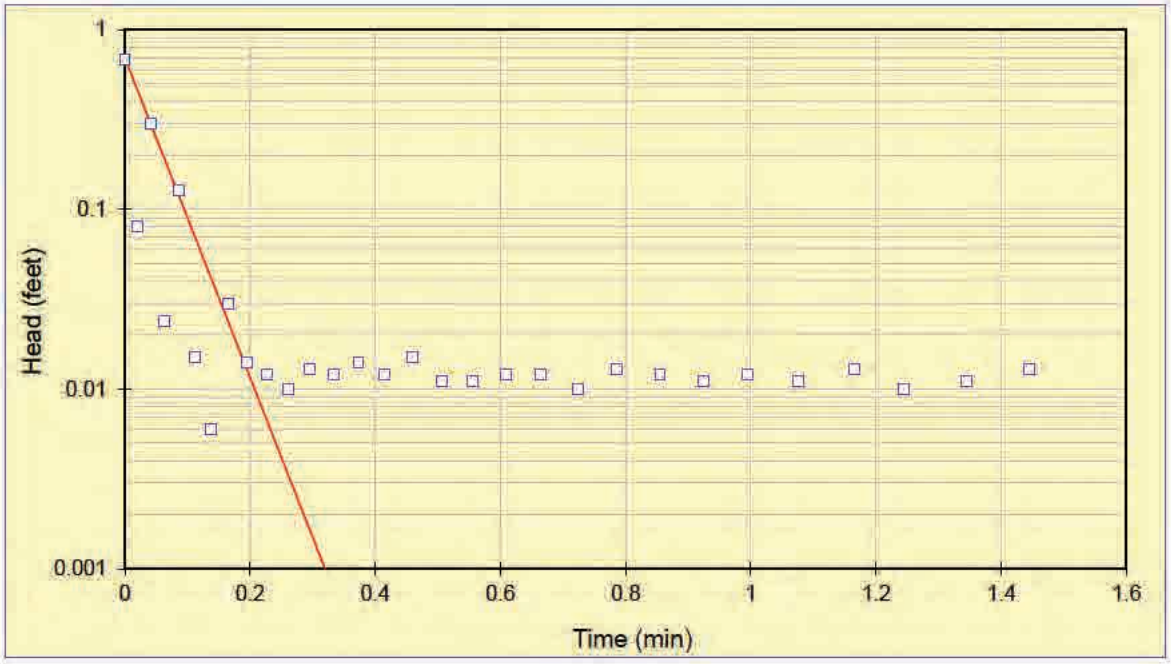
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.70
y_t =	0.001
t =	0.3

RESULTS

K=	1.16E-02	cm/sec
K=	3.30E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

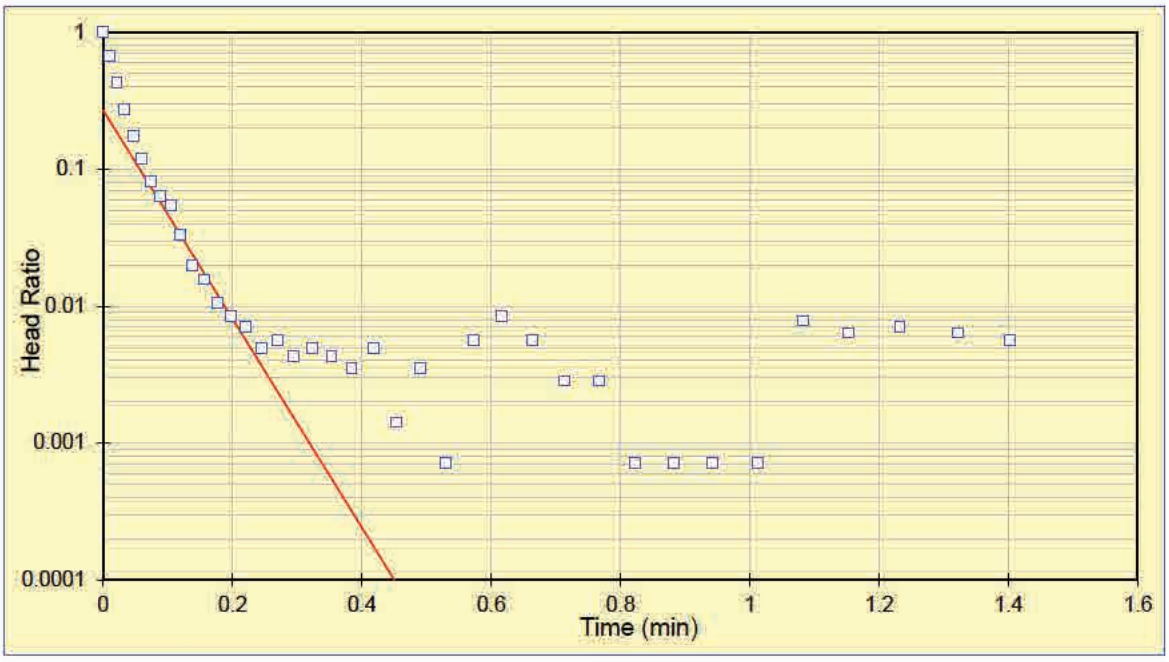
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.037	K=	6.50E-02	cm/sec
t_1 =	0	K=	1.84E+02	ft/day
t_2 =	0.45			
h_1/h_0 =	0.27			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
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Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

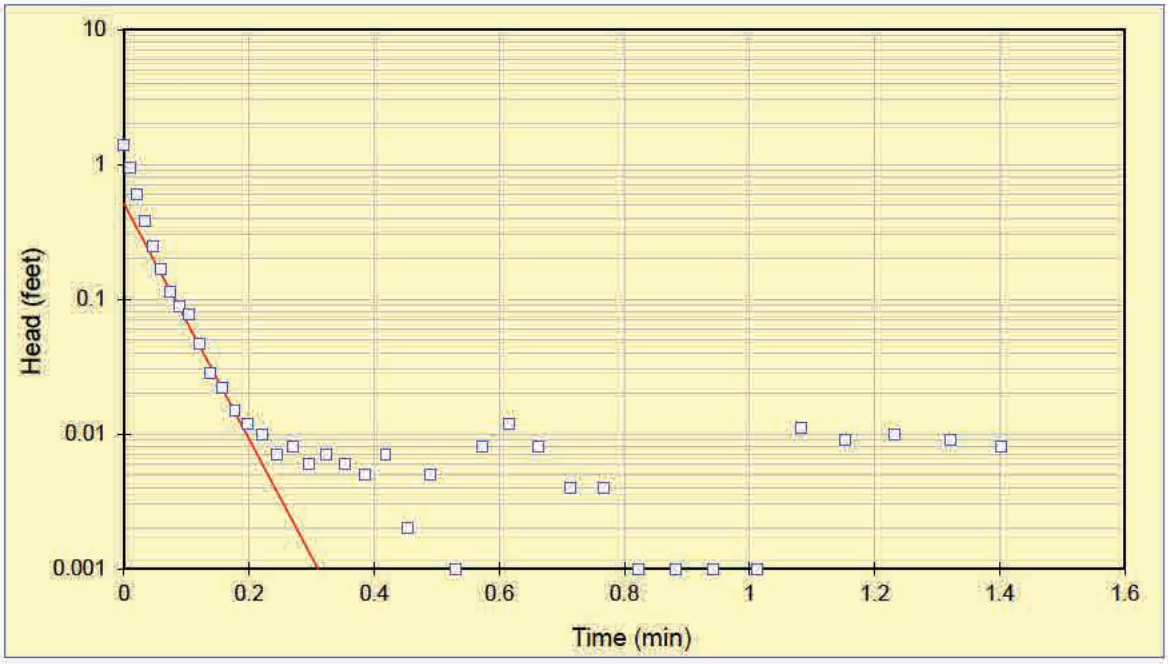
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.037
$\ln(R_e/r_w)$=	2.11
y_0 =	0.51
y_t =	0.001
t =	0.3

RESULTS

K=	4.81E-02	cm/sec
K=	1.36E+02	ft/day



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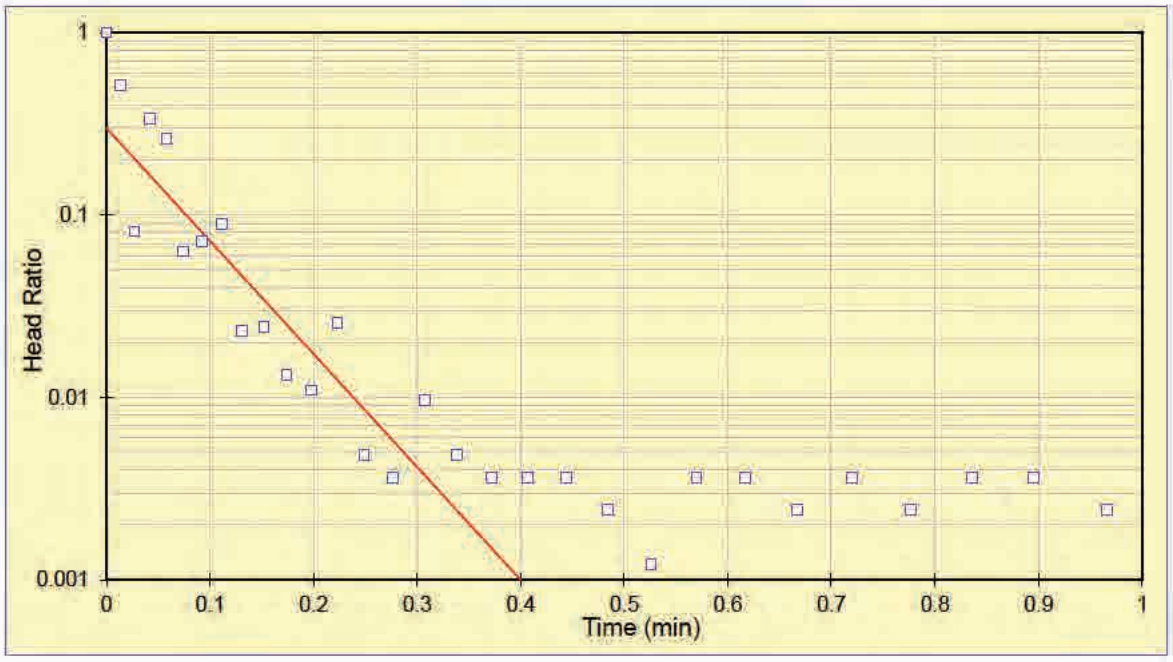
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	8.48E-03	cm/sec
t_1 =	0	K=	2.40E+01	ft/day
t_2 =	0.4			
h_1/h_0 =	0.30			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

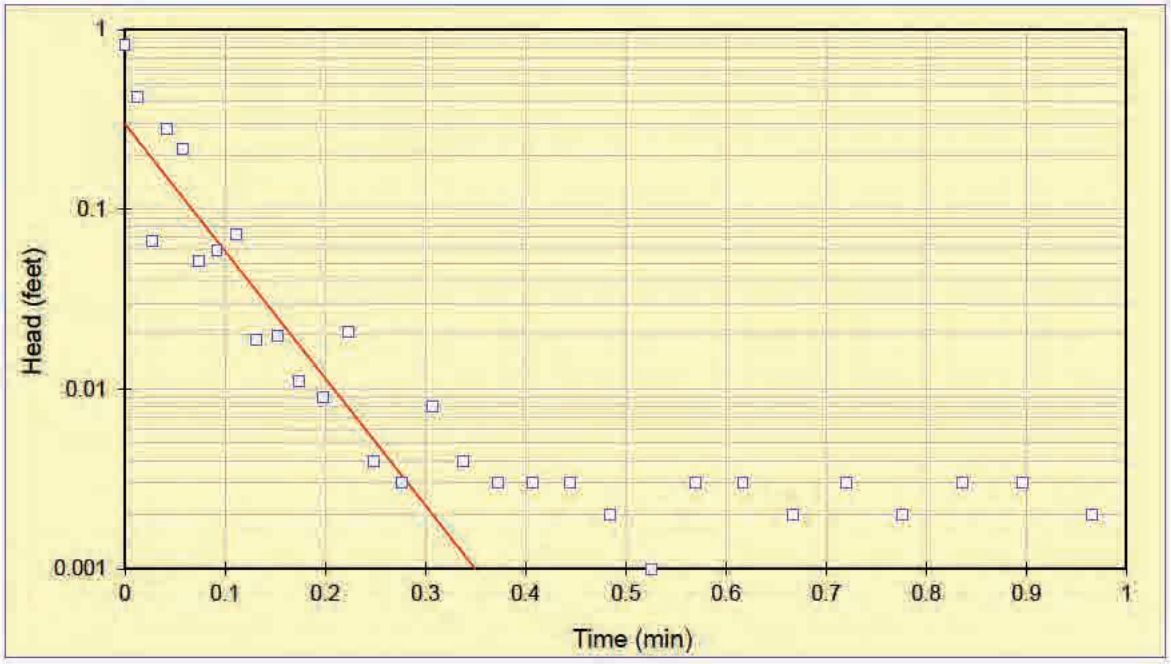
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.30
y_t =	0.001
t =	0.4

RESULTS

K=	9.27E-03	cm/sec
K=	2.63E+01	ft/day



Project Name: NIPSCO Schahfer
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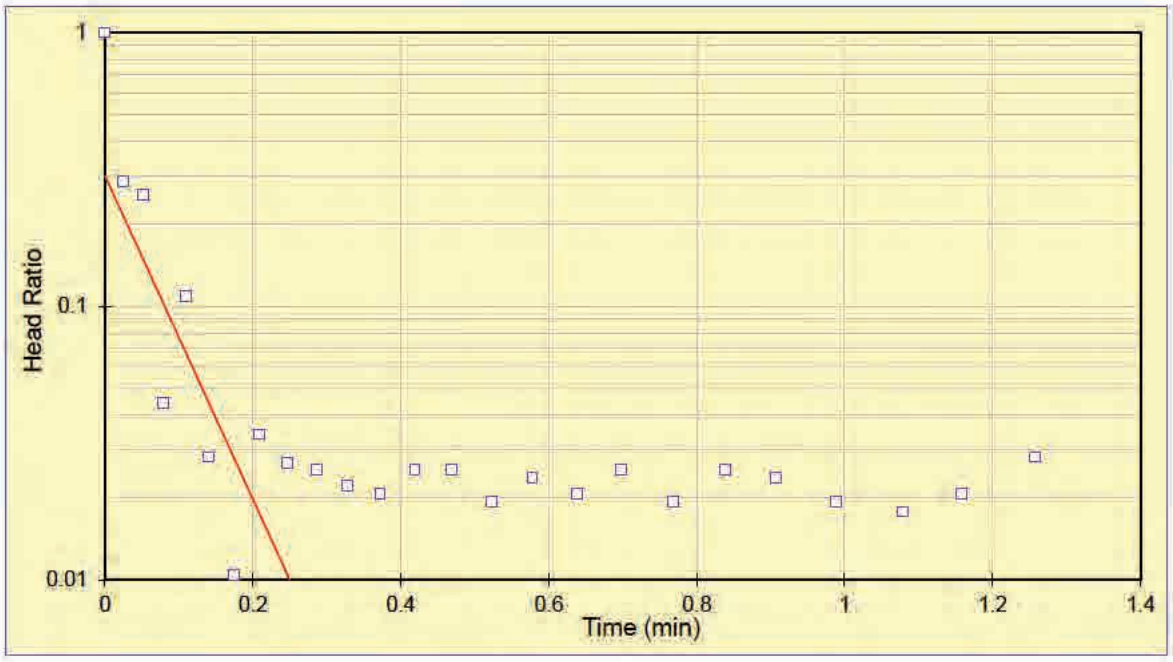
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-13B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	8.09E-03	cm/sec
t_1 =	0	K=	2.29E+01	ft/day
t_2 =	0.25			
h_1/h_0 =	0.30			
h_2/h_0 =	0.01			



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Checked By: JRS
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BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-13B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

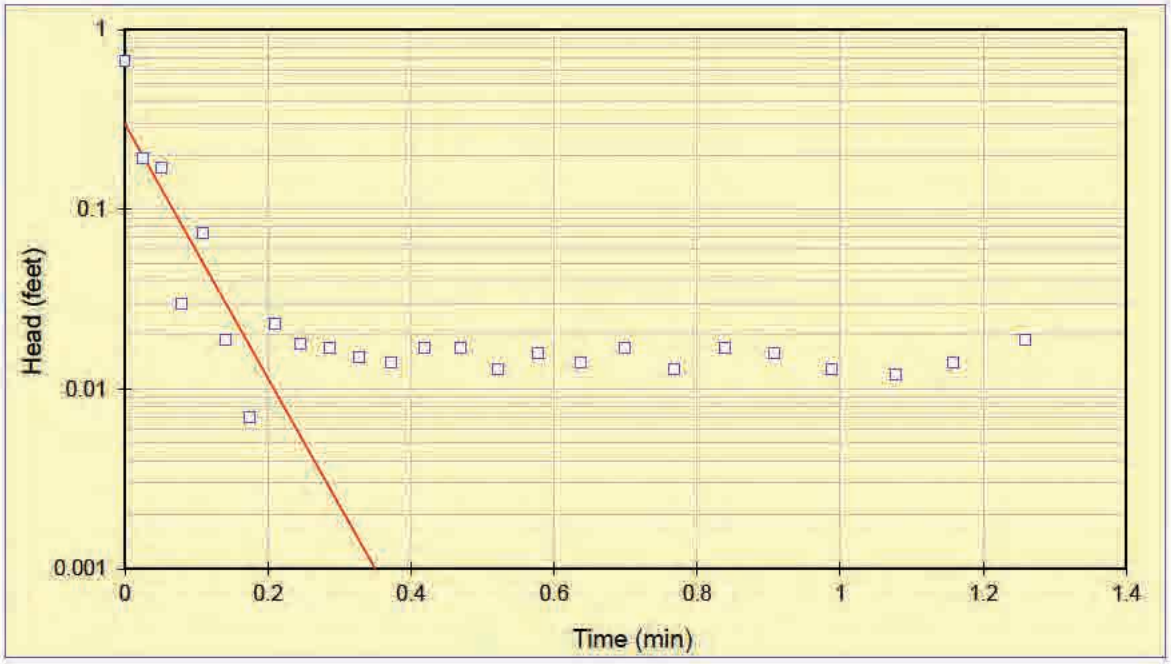
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.30
y_t =	0.001
t =	0.4

RESULTS

K=	9.27E-03	cm/sec
K=	2.63E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-13B (TEST 1)

$$T = b + a \ln T$$

where:

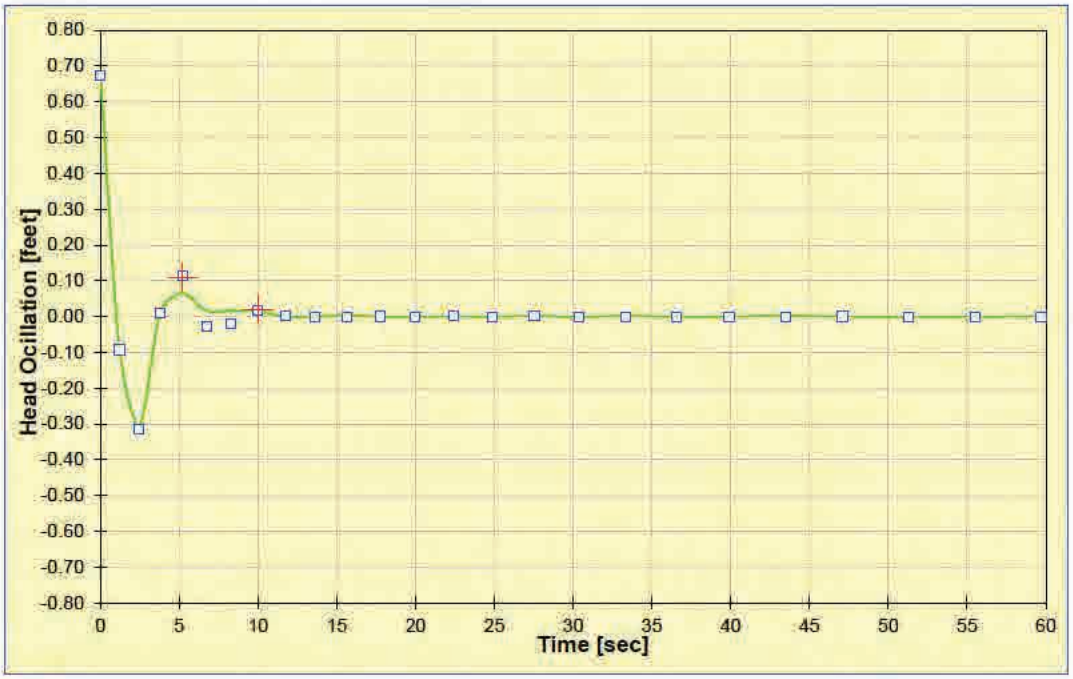
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma/(g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.35632	ft^2
r_s =	0.08	ft	d =	0.2619	ft^{-1}
L_c =	19.45	ft	a =	0.00450	ft^3
L_s =	9.98	ft	t_1 =	5.20	sec
w =	1.3090	ft^{-1}	t_2 =	10.00	sec
g =	0.3552	ft^{-1}	$h(t_1)$ =	0.11	ft
L =	17.50	ft^3/sec^2	$h(t_2)$ =	0.02	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	4.27E-02 ft^2/sec	a < 0.1?	YES
T =	2.64E-02 ft^2/sec	d < 0.7?	YES
T =	2.28E+03 ft^2/day	L_1 =	17.50
K =	7.74E+01 ft/day	L_2 =	24.44
K =	2.73E-02 cm/sec	L_1:L_2 Diff <20% ?	NO



Project Name: NIPSCO RMSGS
Project No.: 164-8171
Test Date: 07/07/16

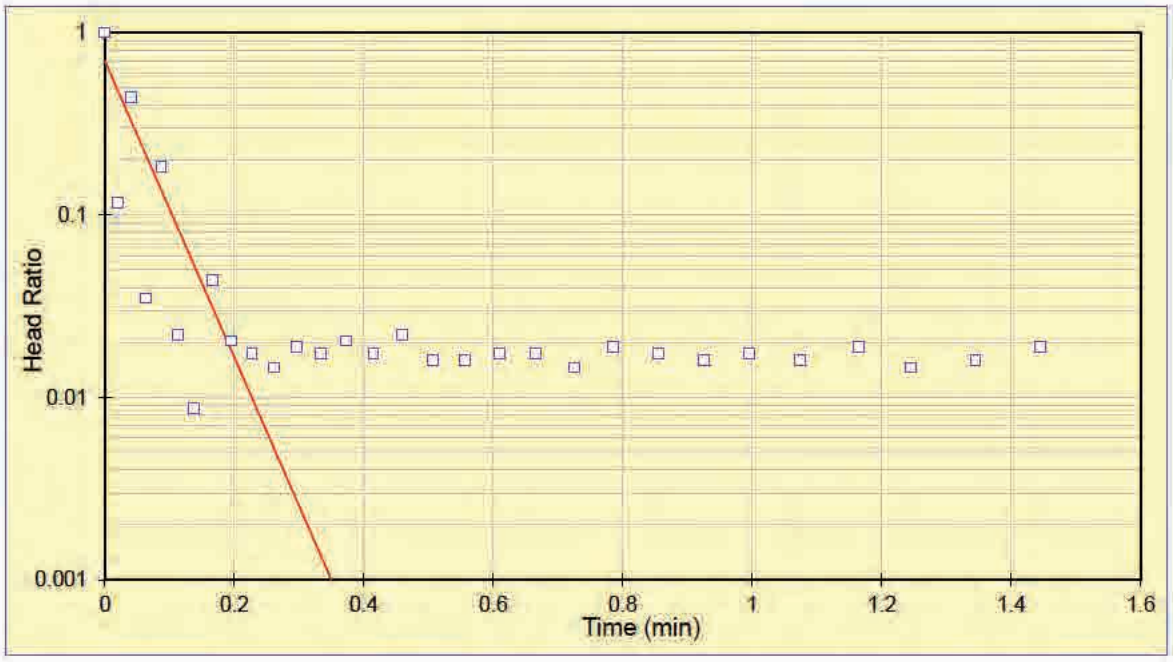
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.11E-02	cm/sec
t_1 =	0	K=	3.15E+01	ft/day
t_2 =	0.35			
h_1/h_0 =	0.70			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

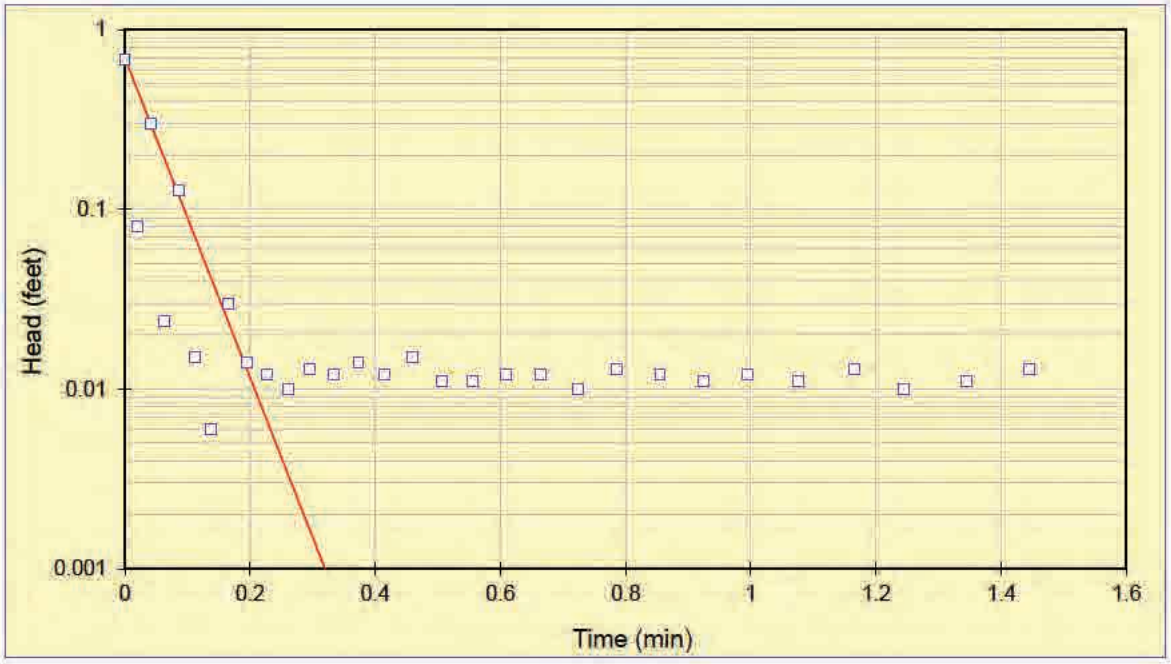
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.70
y_t =	0.001
t =	0.3

RESULTS

K=	1.16E-02	cm/sec
K=	3.30E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-13B (TEST 2)

$$T = b + a \ln T$$

where:

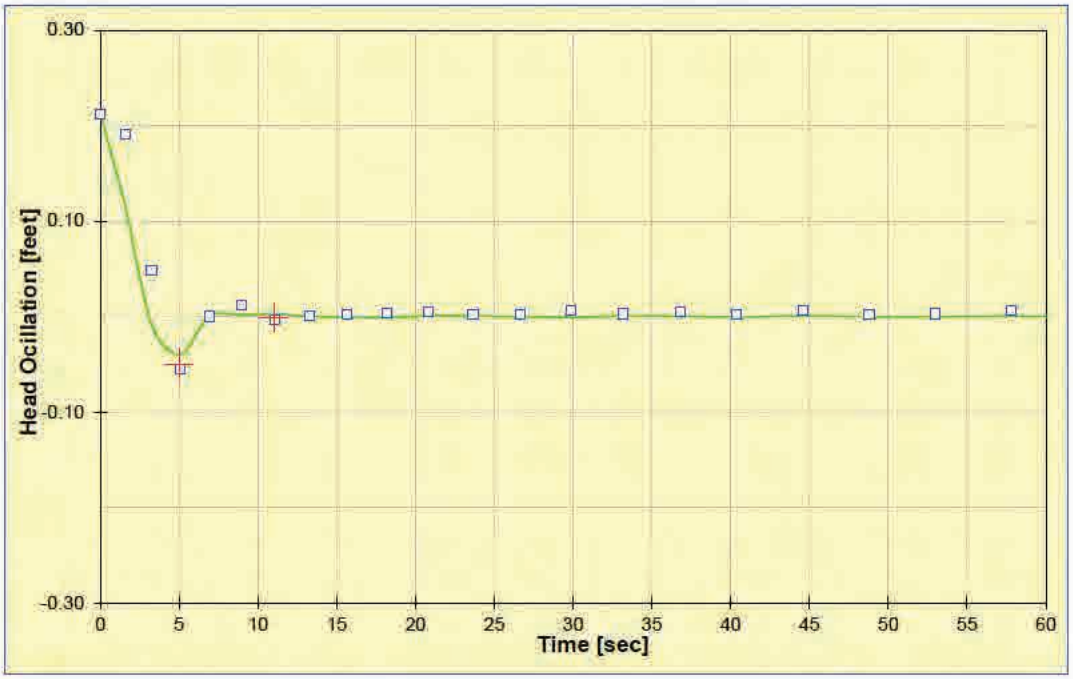
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma / (g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.23358	ft^2
r_s =	0.08	ft	d =	0.5285	ft^{-1}
L_c =	19.14	ft	a =	0.00203	ft^3
L_s =	9.98	ft	t_1 =	5.00	sec
w =	1.0472	ft^{-1}	t_2 =	11.00	sec
g =	0.6520	ft^{-1}	$h(t_1)$ =	0.05	ft
L =	21.15	ft^3/sec^2	$h(t_2)$ =	0.00	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	1.95E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.02E-02 ft^2/sec	$d < 0.7$?	YES
T =	8.77E+02 ft^2/day	L_1 =	21.15
K =	3.01E+01 ft/day	L_2 =	24.13
K =	1.06E-02 cm/sec	L_1:L_2 Diff <20% ?	YES



Project Name: NIPSCO RMSGS
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Test Date: 07/07/16

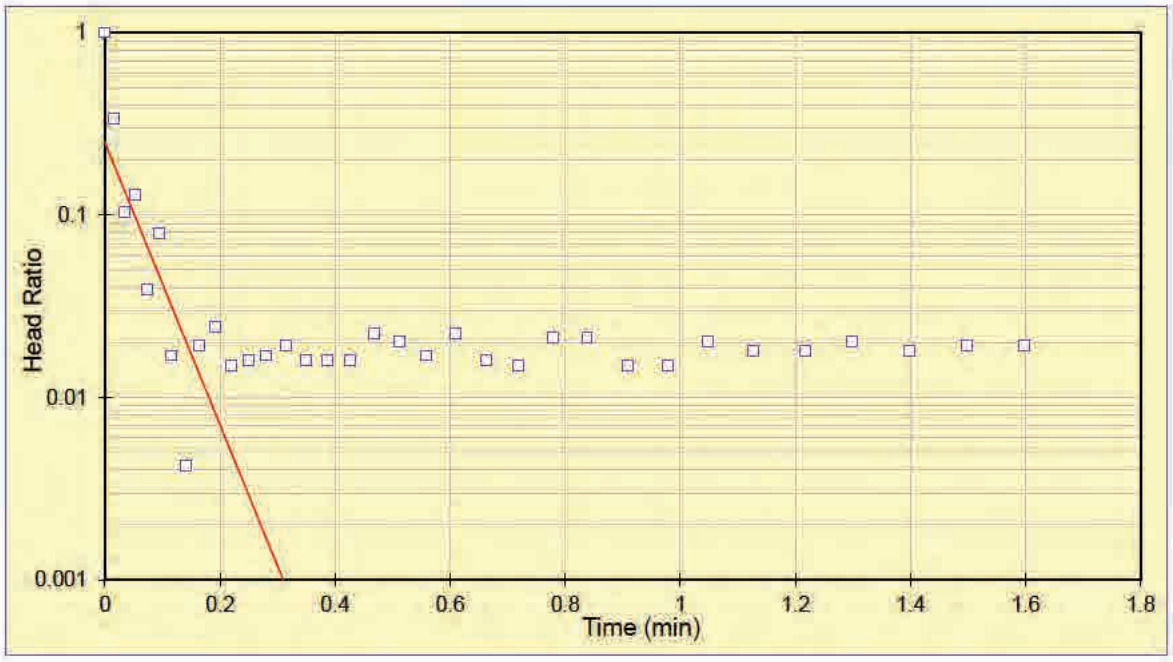
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.06E-02	cm/sec
t_1 =	0	K=	3.00E+01	ft/day
t_2 =	0.31			
h_1/h_0 =	0.25			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

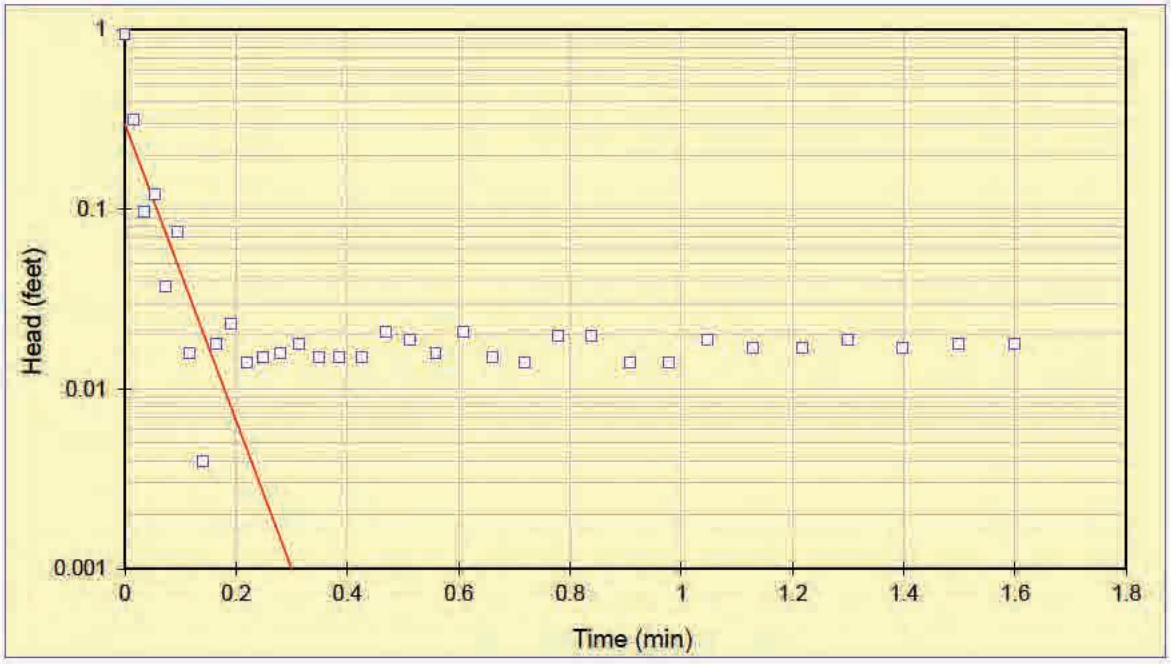
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.30
y_t =	0.001
t =	0.3

RESULTS

K=	1.08E-02	cm/sec
K=	3.06E+01	ft/day



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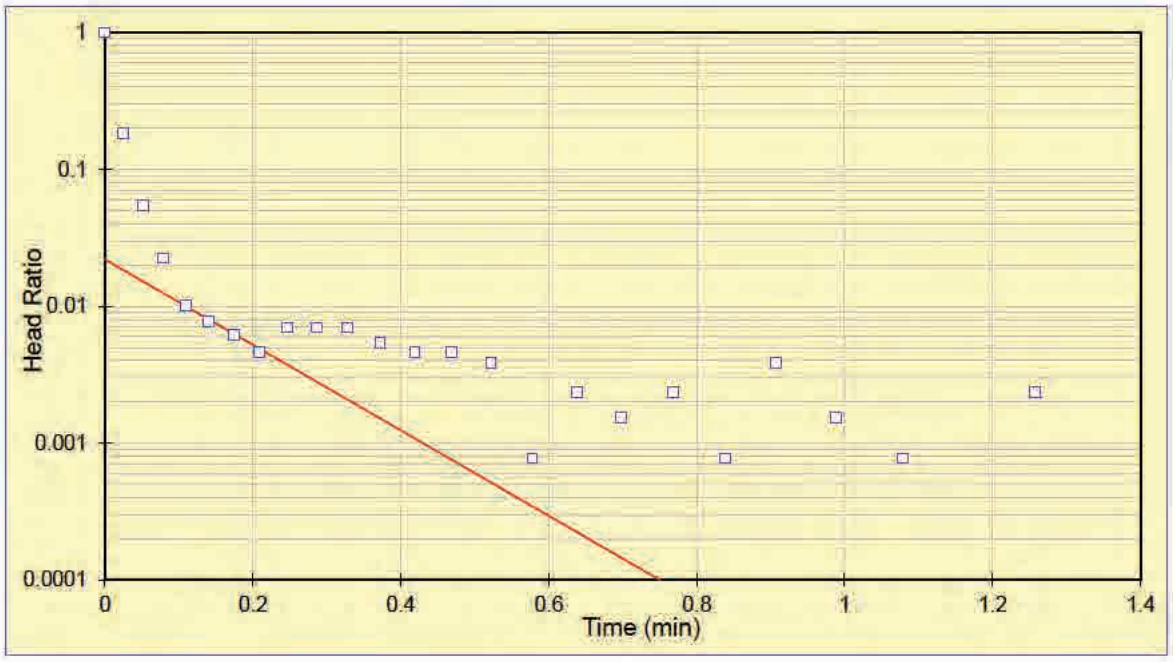
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15 (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.417	K=	2.59E-02	cm/sec
t_1 =	0	K=	7.34E+01	ft/day
t_2 =	0.75			
h_1/h_0 =	0.02			
h_2/h_0 =	0.00			



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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15 (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

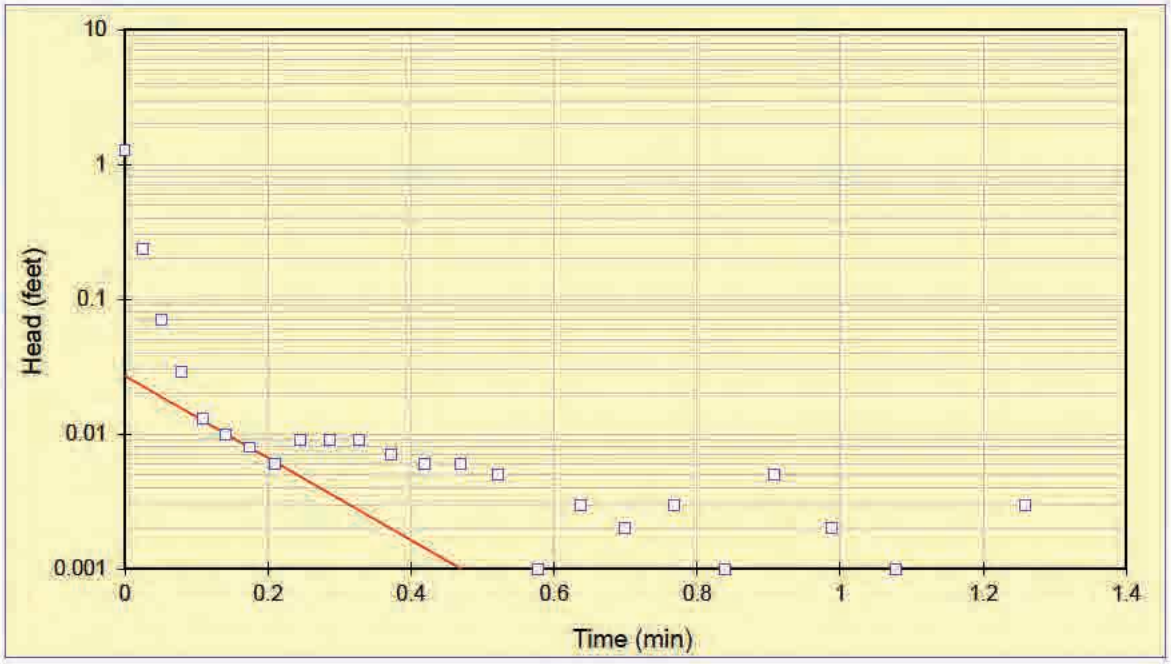
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.417
$\ln(R_e/r_w)$=	2.14
y_0 =	0.03
y_t =	0.001
t =	0.5

RESULTS

K=	1.63E-02	cm/sec
K=	4.63E+01	ft/day



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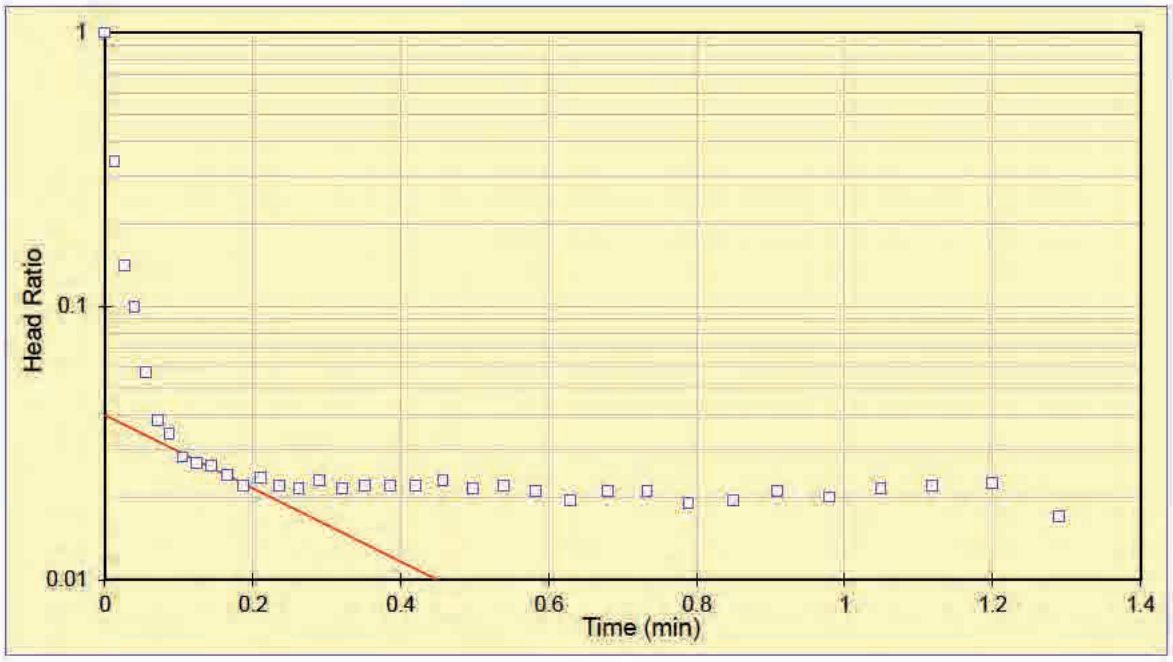
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.348	K=	1.11E-02	cm/sec
t_1 =	0	K=	3.16E+01	ft/day
t_2 =	0.45			
h_1/h_0 =	0.04			
h_2/h_0 =	0.01			



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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

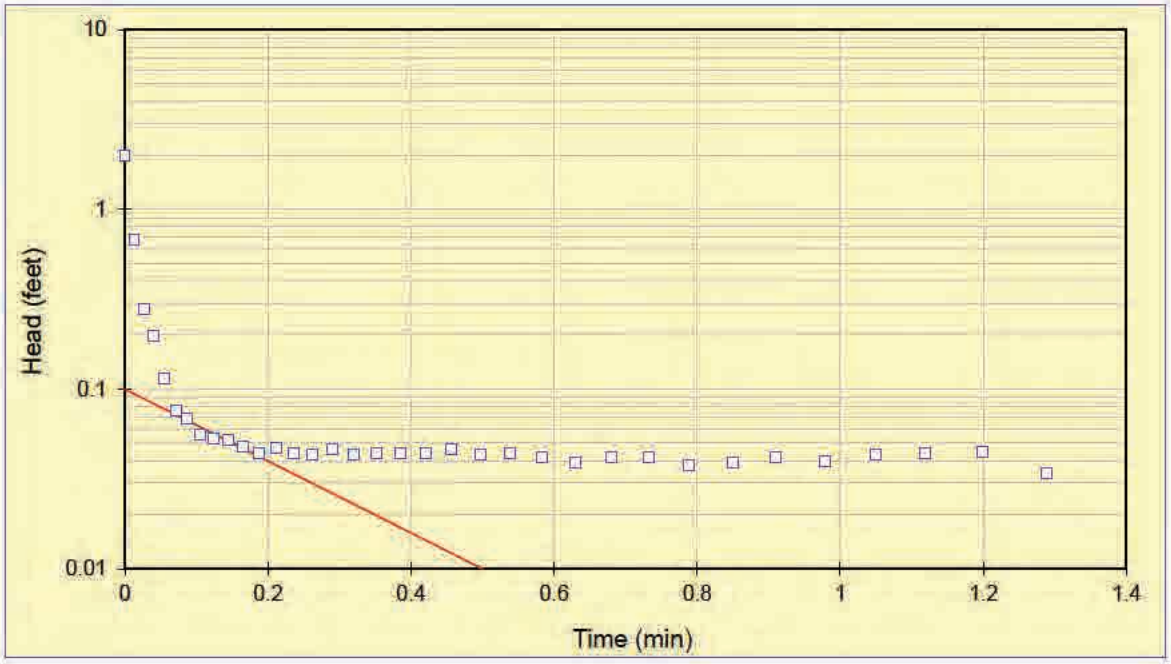
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.348
$\ln(R_e/r_w)$=	2.13
y_0 =	0.10
y_t =	0.010
t =	0.5

RESULTS

K=	1.08E-02	cm/sec
K=	3.05E+01	ft/day



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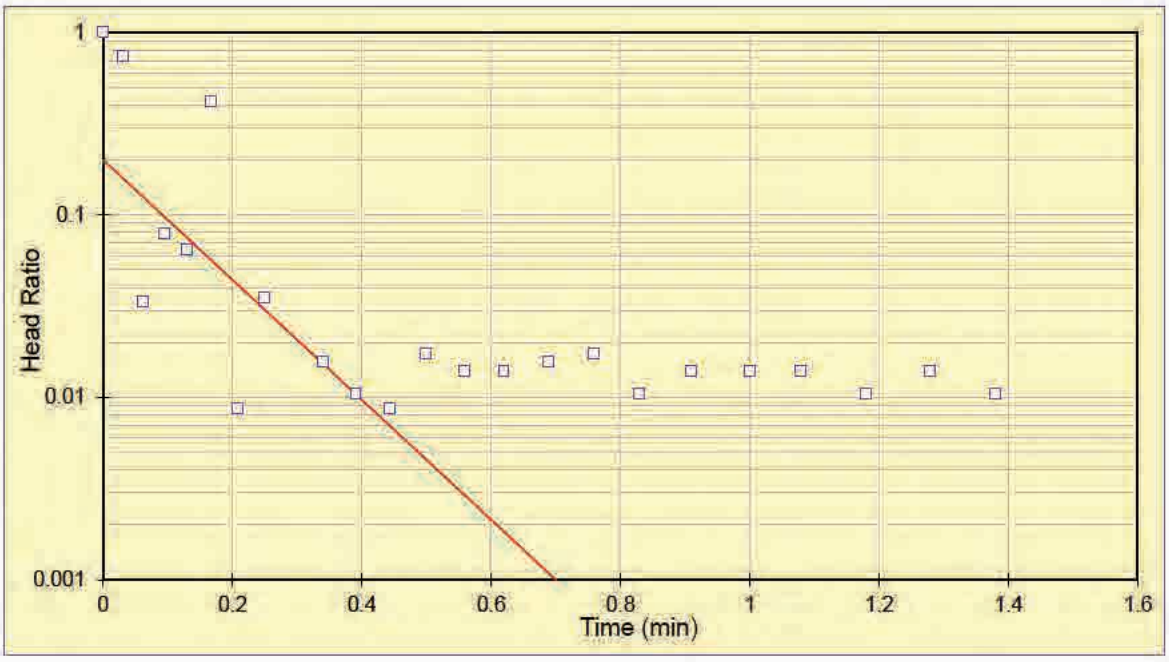
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-15B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	4.50E-03	cm/sec
t_1 =	0	K=	1.28E+01	ft/day
t_2 =	0.7			
h_1/h_0 =	0.20			
h_2/h_0 =	0.00			



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BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-15B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

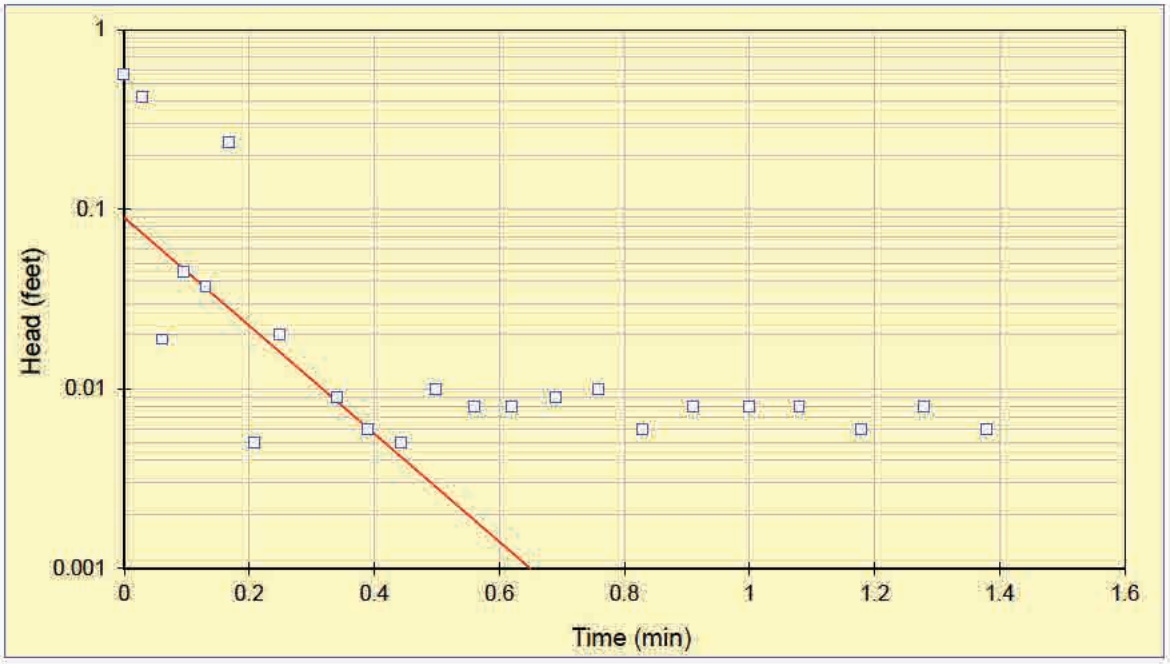
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.83
y_0 =	0.09
y_t =	0.001
t =	0.7

RESULTS

K=	3.45E-03	cm/sec
K=	9.79E+00	ft/day



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Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP FALLING HEAD SLUG TEST ANALYSIS

UNDERDAMPED SLUG TEST GAMW-15B (TEST 2)

$$T = b + a \ln T$$

where:

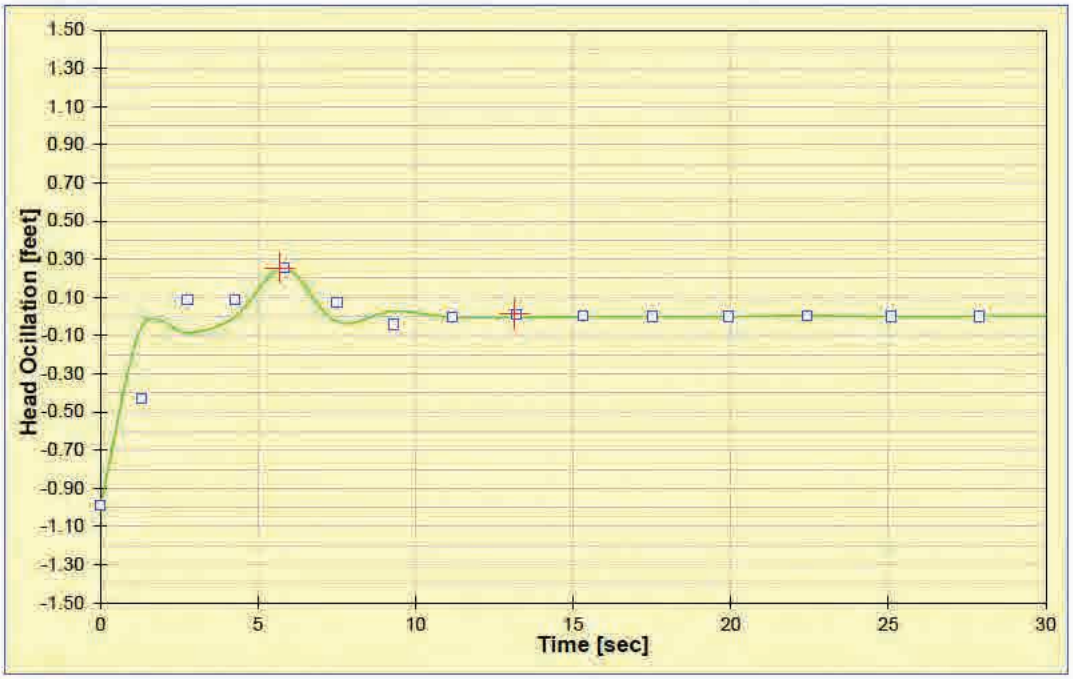
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma/(g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	0.93787	ft^2
r_s =	0.08	ft	d =	0.4374	ft^{-1}
L_c =	19.23	ft	a =	0.00186	ft^3
L_s =	10.00	ft	t_1 =	5.70	sec
w =	0.8434	ft^{-1}	t_2 =	13.15	sec
g =	0.4102	ft^{-1}	$h(t_1)$ =	0.26	ft
L =	36.60	ft^3/sec^2	$h(t_2)$ =	0.01	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	1.84E-02 ft^2/sec	$a < 0.1$?	YES
T =	9.76E-03 ft^2/sec	$d < 0.7$?	YES
T =	8.44E+02 ft^2/day	L_1 =	36.60
K =	2.70E+01 ft/day	L_2 =	24.23
K =	9.53E-03 cm/sec	L_1:L_2 Diff <20% ?	NO



Project Name: NIPSCO RMSGS
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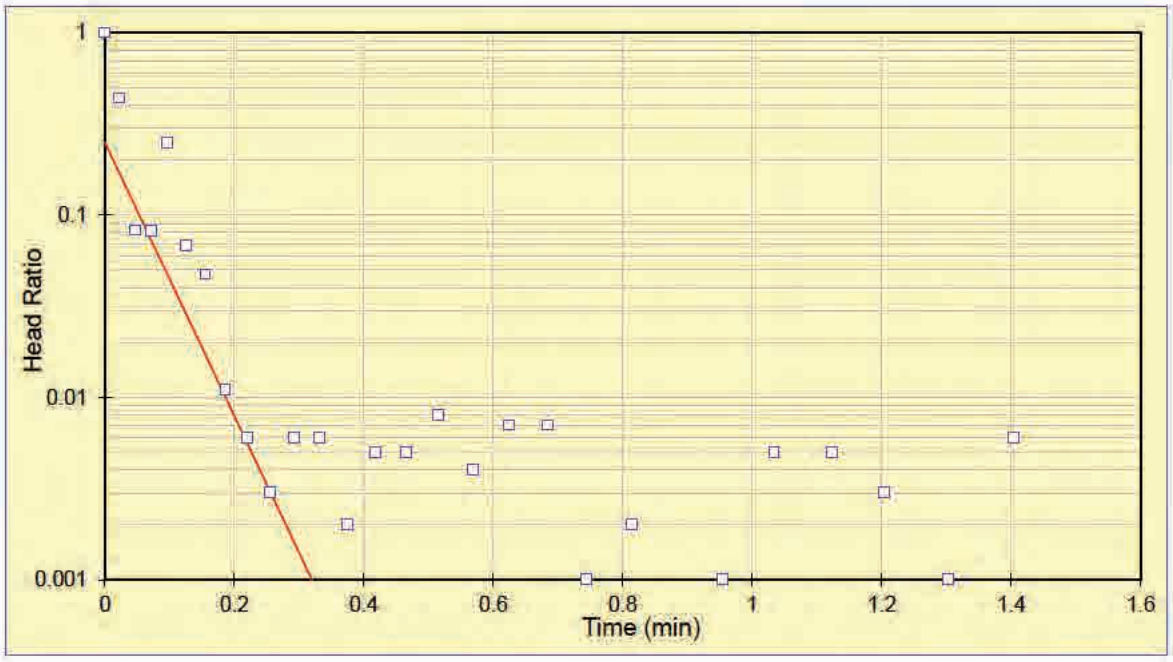
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-15B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.03E-02	cm/sec
t_1 =	0	K=	2.91E+01	ft/day
t_2 =	0.32			
h_1/h_0 =	0.25			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
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Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-15B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

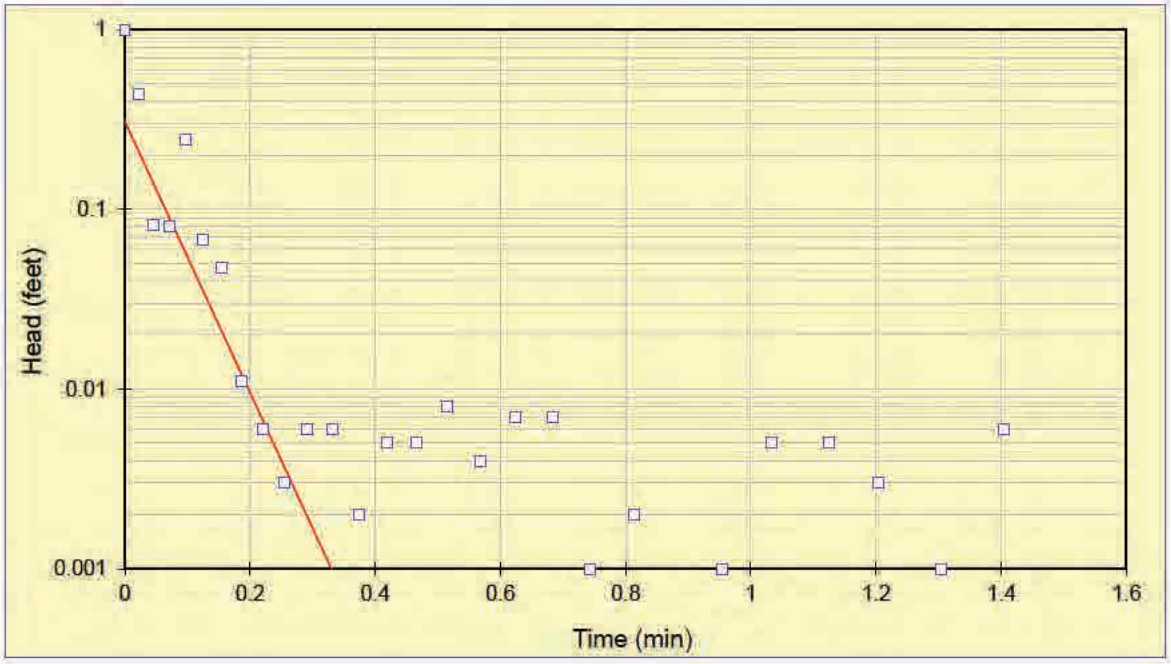
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.85
y_0 =	0.31
y_t =	0.001
t =	0.3

RESULTS

K=	8.75E-03	cm/sec
K=	2.48E+01	ft/day



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Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
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van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-15B (TEST 1)

$$T = b + a \ln T$$

where:

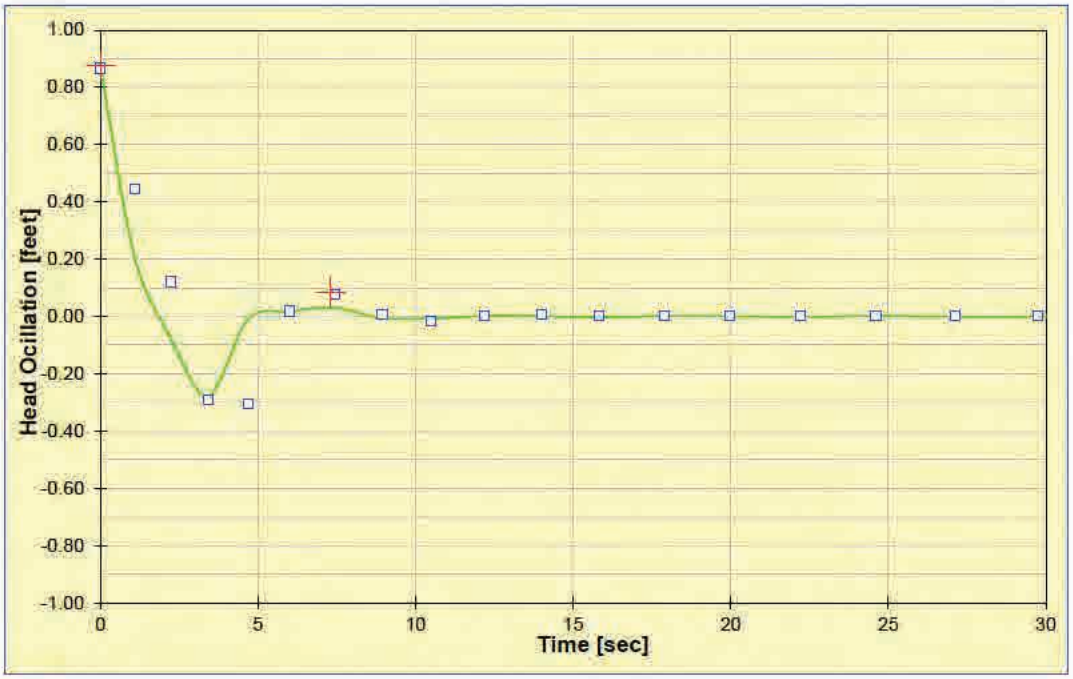
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma / (g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	0.91806	ft^2
r_s =	0.08	ft	d =	0.3479	ft^{-1}
L_c =	19.23	ft	a =	0.00229	ft^3
L_s =	10.00	ft	t_1 =	0.00	sec
w =	0.8607	ft^{-1}	t_2 =	7.30	sec
g =	0.3194	ft^{-1}	$h(t_1)$ =	0.88	ft
L =	38.19	ft^3/sec^2	$h(t_2)$ =	0.09	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.27E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.27E-02 ft^2/sec	$d < 0.7$?	YES
T =	1.09E+03 ft^2/day	L_1 =	38.19
K =	3.50E+01 ft/day	L_2 =	24.23
K =	1.24E-02 cm/sec	L_1:L_2 Diff <20% ?	NO



Project Name: NIPSCO RMSGS
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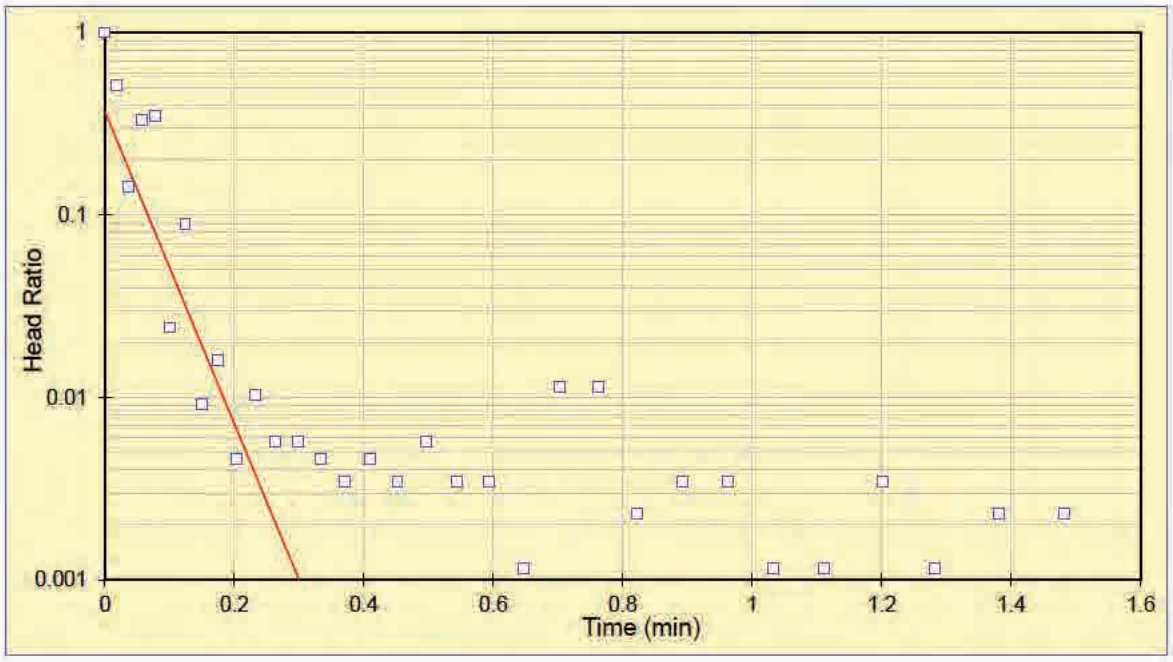
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.17E-02	cm/sec
t_1 =	0	K=	3.32E+01	ft/day
t_2 =	0.3			
h_1/h_0 =	0.37			
h_2/h_0 =	0.00			



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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

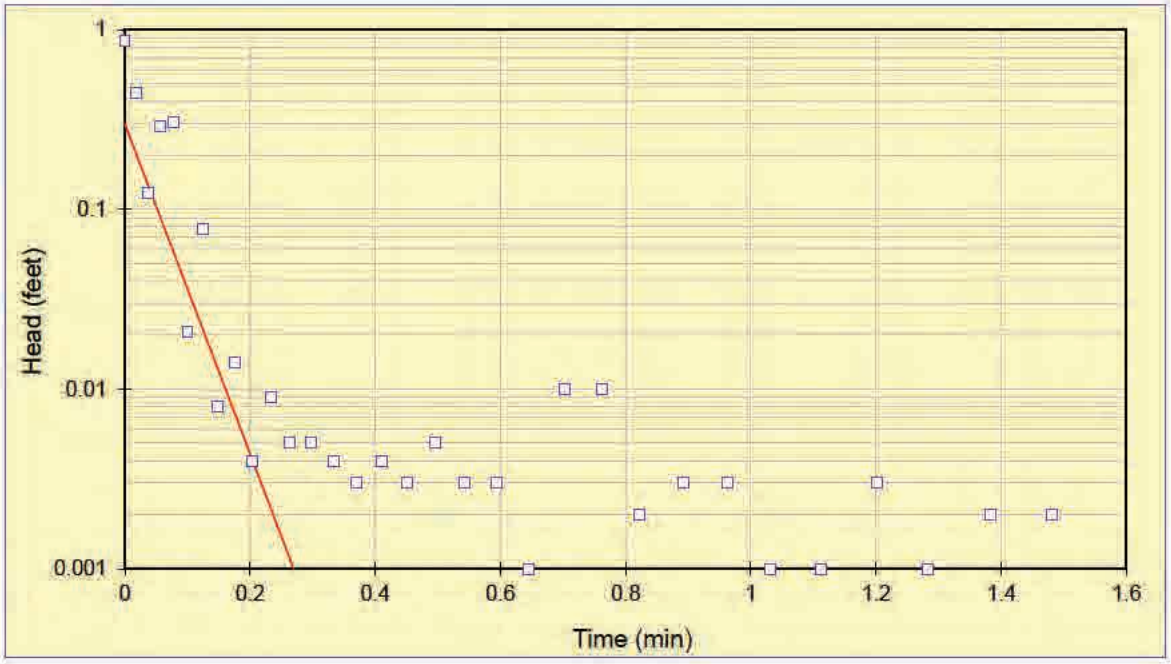
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.85
y_0 =	0.30
y_t =	0.001
t =	0.3

RESULTS

K=	1.06E-02	cm/sec
K=	3.02E+01	ft/day



Project Name: NIPSCO Schahfer
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van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-15B (TEST 2)

$$T = b + a \ln T$$

where:

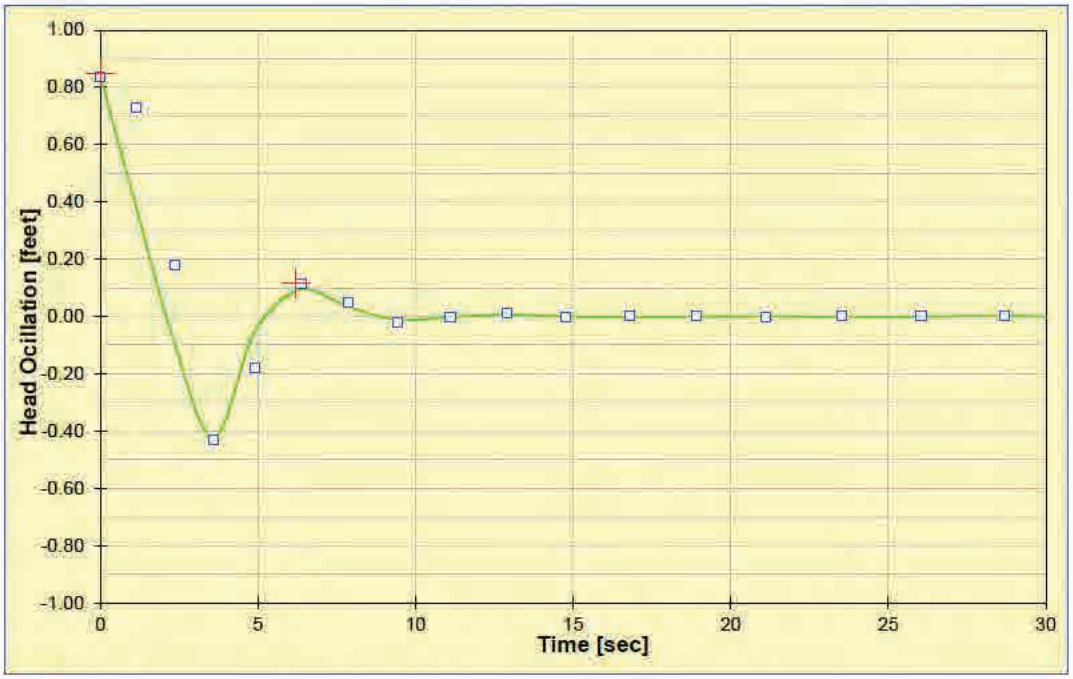
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma/(g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.06353	ft^2
r_s =	0.08	ft	d =	0.3034	ft^{-1}
L_c =	19.22	ft	a =	0.00304	ft^3
L_s =	10.00	ft	t_1 =	0.00	sec
w =	1.0134	ft^{-1}	t_2 =	6.20	sec
g =	0.3226	ft^{-1}	$h(t_1)$ =	0.85	ft
L =	28.46	ft^3/sec^2	$h(t_2)$ =	0.12	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.97E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.73E-02 ft^2/sec	$d < 0.7$?	YES
T =	1.50E+03 ft^2/day	L_1 =	28.46
K =	4.80E+01 ft/day	L_2 =	24.22
K =	1.69E-02 cm/sec	L_1:L_2 Diff <20% ?	YES



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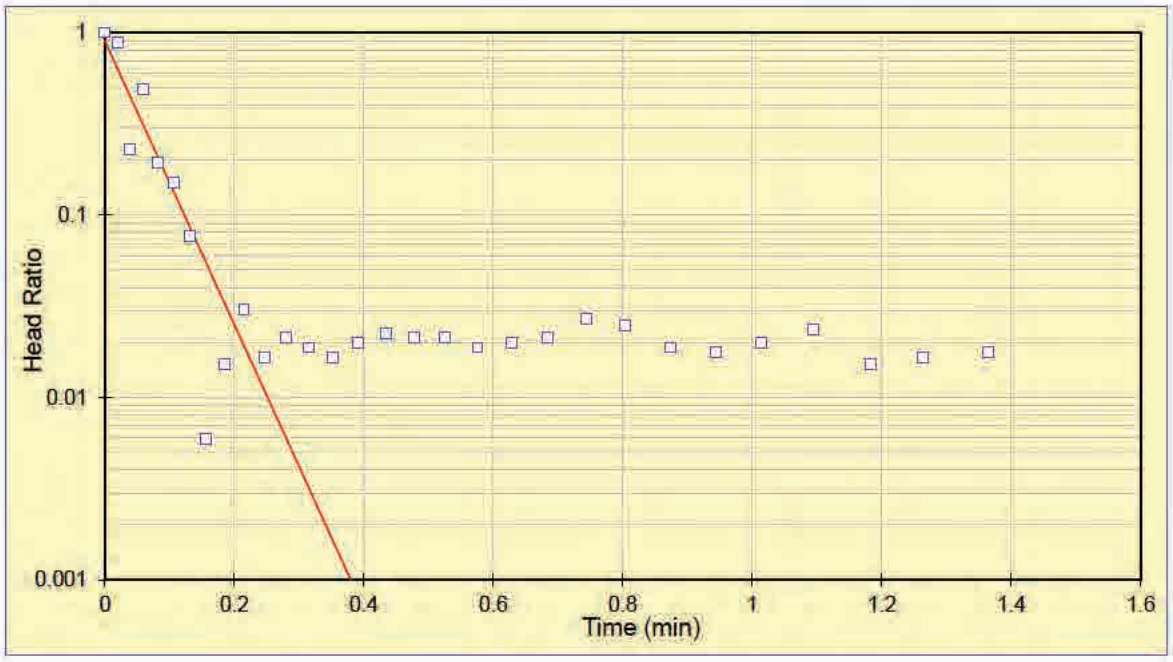
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.06E-02	cm/sec
t_1 =	0	K=	3.02E+01	ft/day
t_2 =	0.38			
h_1/h_0 =	0.90			
h_2/h_0 =	0.00			



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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

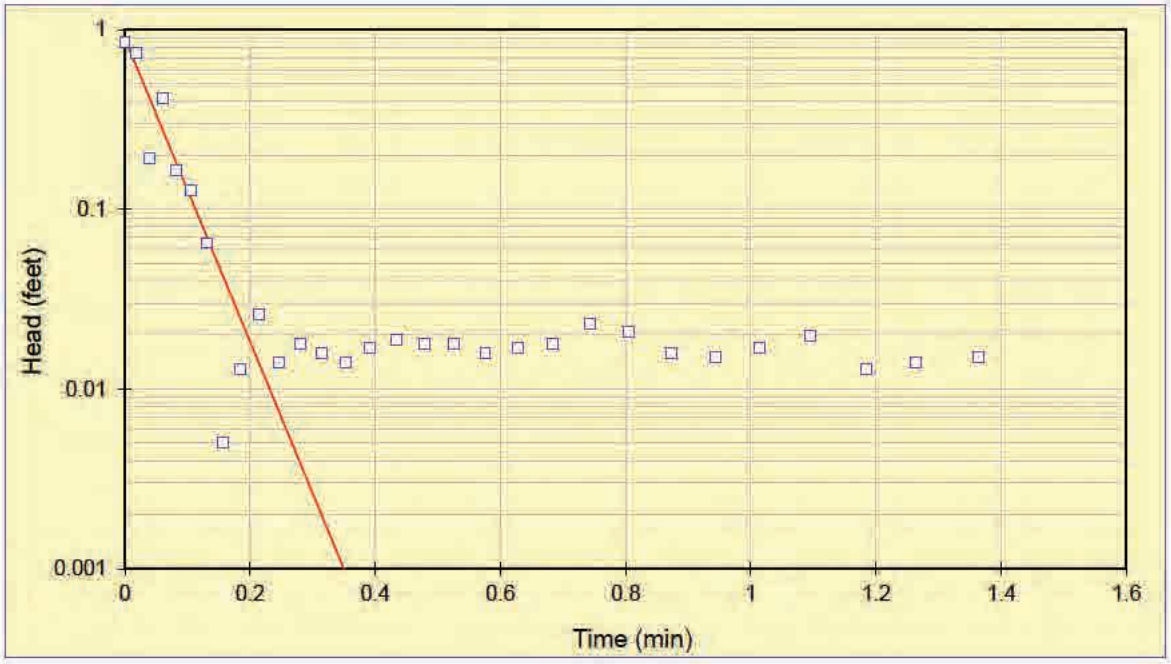
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.85
y_0 =	0.90
y_t =	0.001
t =	0.4

RESULTS

K=	9.79E-03	cm/sec
K=	2.77E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

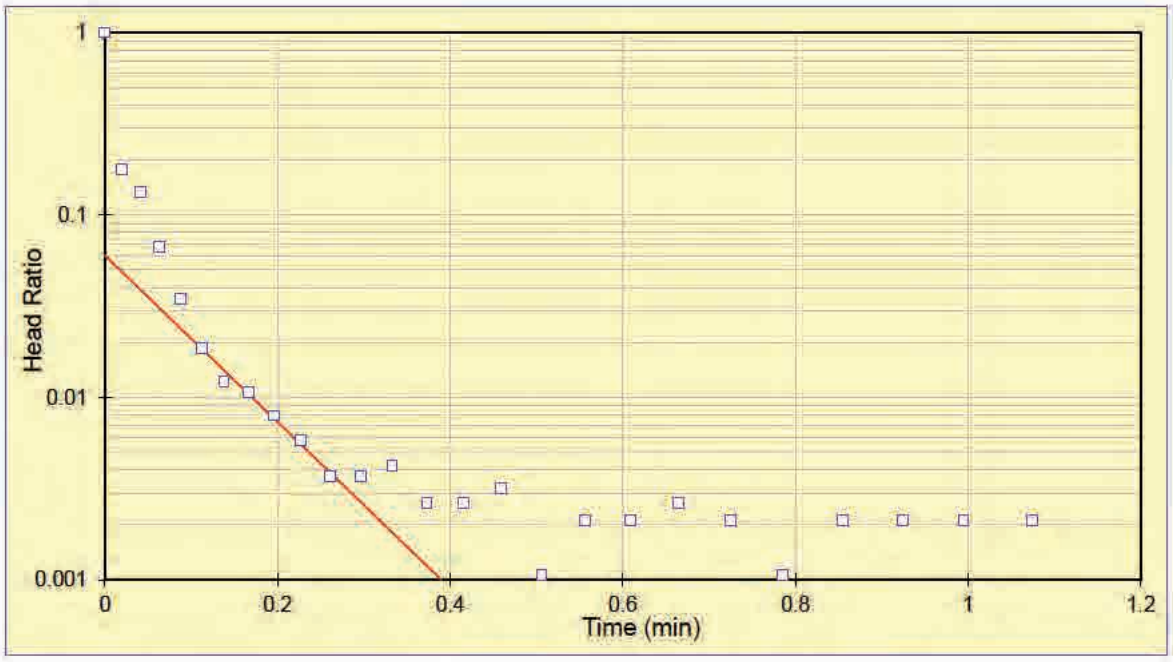
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19 (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.705	K=	3.70E-02	cm/sec
t_1 =	0	K=	1.05E+02	ft/day
t_2 =	0.39			
h_1/h_0 =	0.06			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19 (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

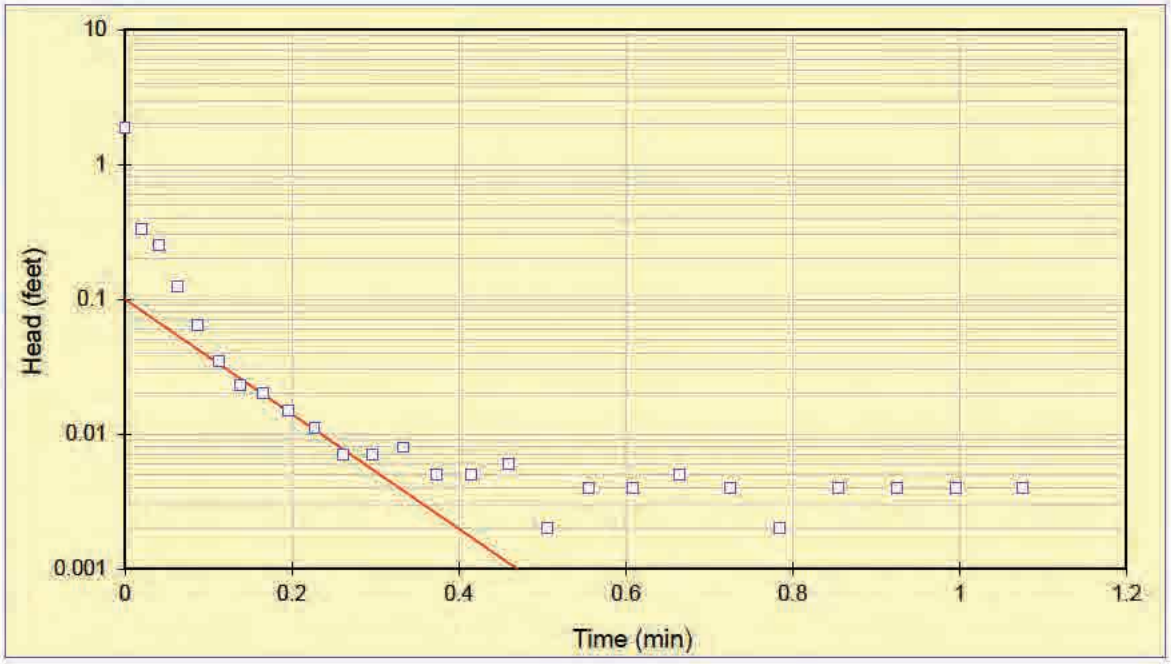
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.705
$\ln(R_e/r_w)$=	2.18
y_0 =	0.10
y_t =	0.001
t =	0.5

RESULTS

K=	2.25E-02	cm/sec
K=	6.38E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

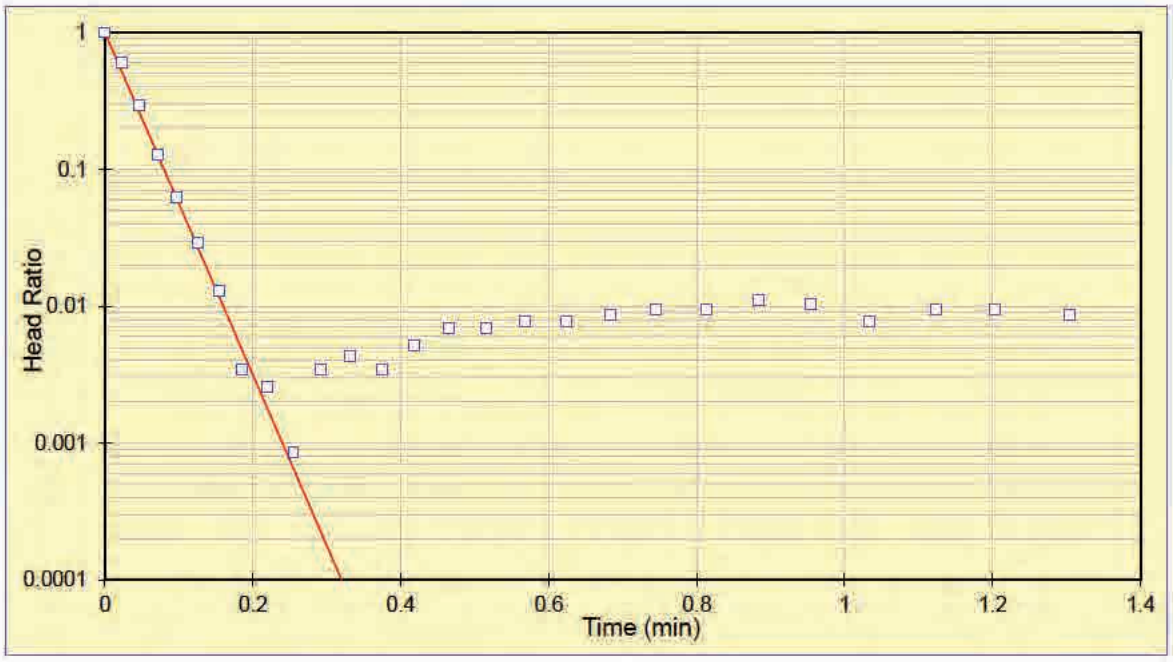
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.735	K=	1.01E-01	cm/sec
t_1 =	0	K=	2.87E+02	ft/day
t_2 =	0.32			
h_1/h_0 =	1.00			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

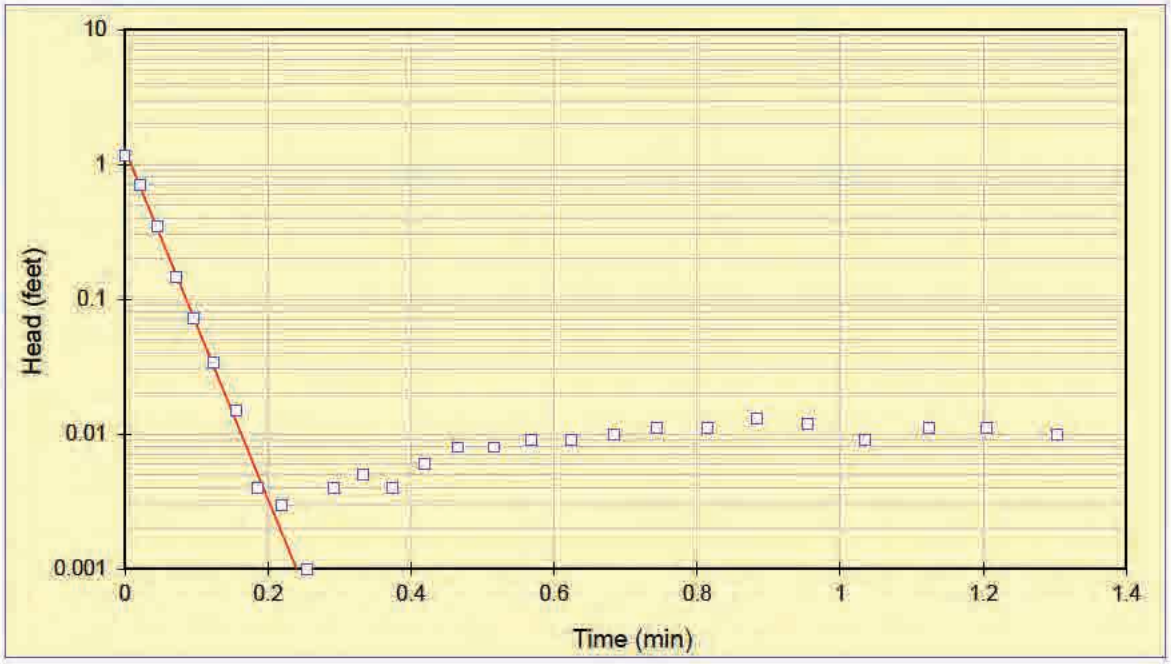
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.735
$\ln(R_e/r_w)$=	2.18
y_0 =	1.30
y_t =	0.001
t =	0.2

RESULTS

K=	6.85E-02	cm/sec
K=	1.94E+02	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

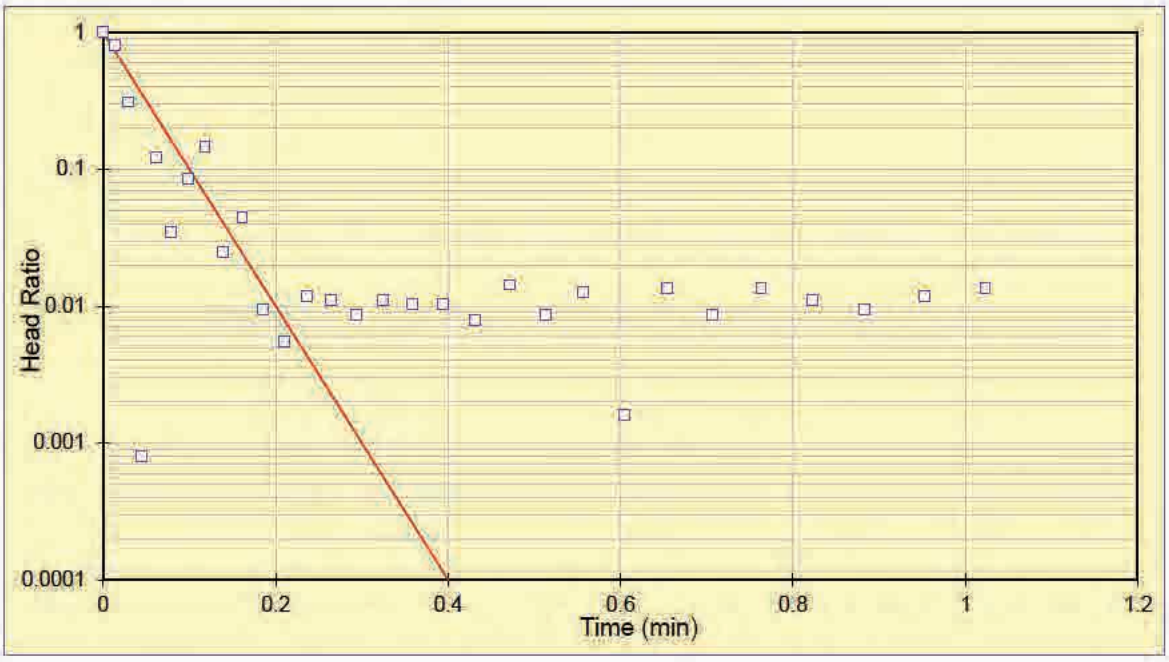
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-19B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.37E-02	cm/sec
t_1 =	0	K=	3.88E+01	ft/day
t_2 =	0.4			
h_1/h_0 =	1.00			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-19B (TEST 1)

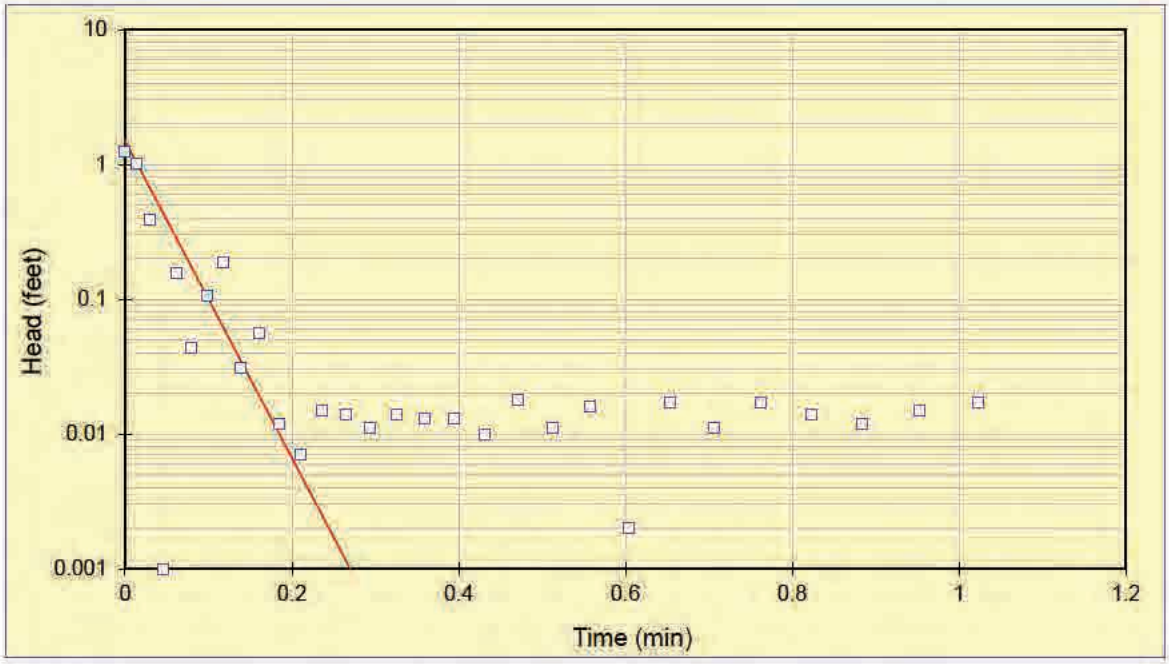
$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.02
y_0 =	1.50
y_t =	0.001
t =	0.3

RESULTS		
K=	1.44E-02	cm/sec
K=	4.09E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

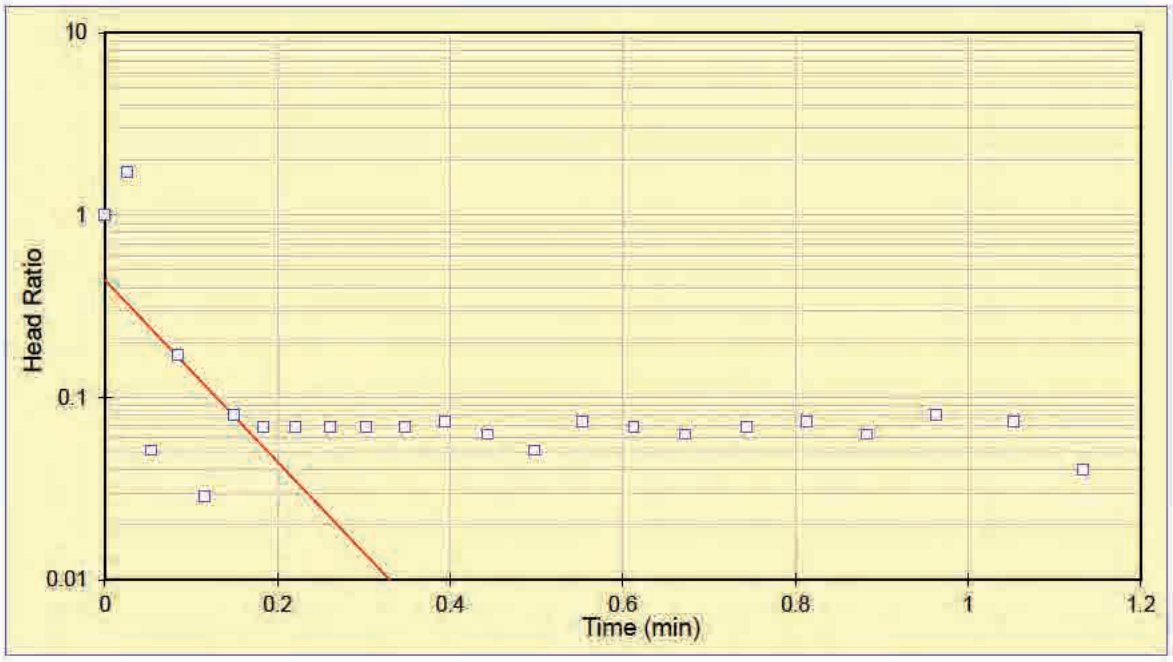
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-19B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	6.82E-03	cm/sec
t_1 =	0	K=	1.93E+01	ft/day
t_2 =	0.33			
h_1/h_0 =	0.44			
h_2/h_0 =	0.01			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-19B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

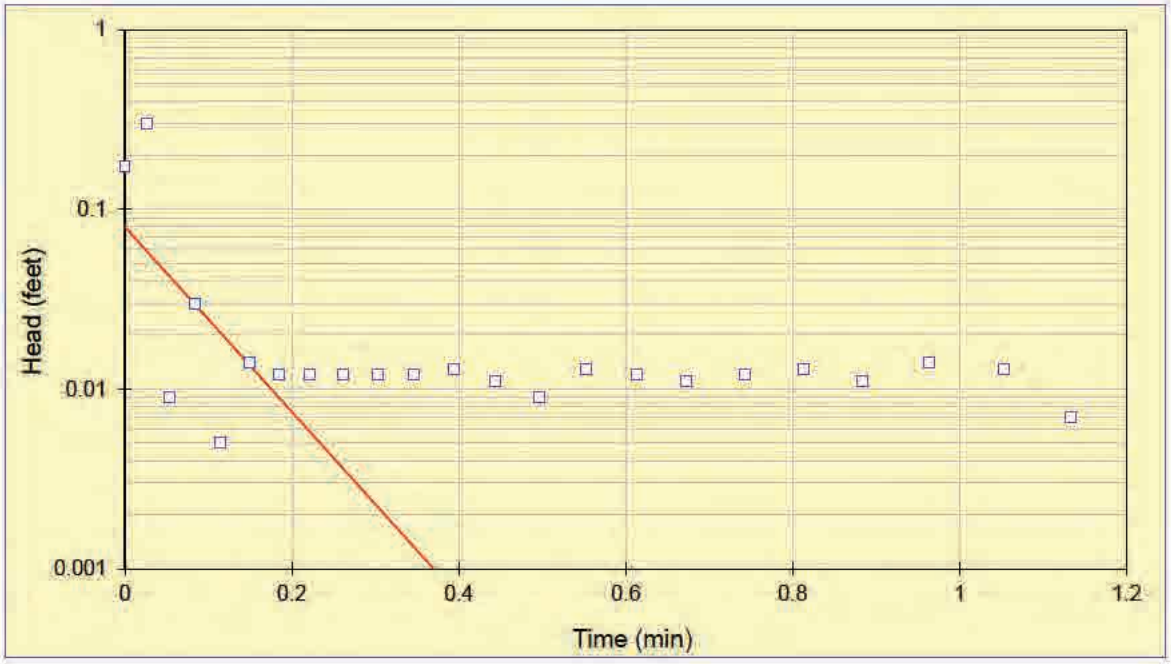
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.02
y_0 =	0.08
y_t =	0.001
t =	0.4

RESULTS

K=	6.31E-03	cm/sec
K=	1.79E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-19B (TEST 1)

$$T = b + a \ln T$$

where:

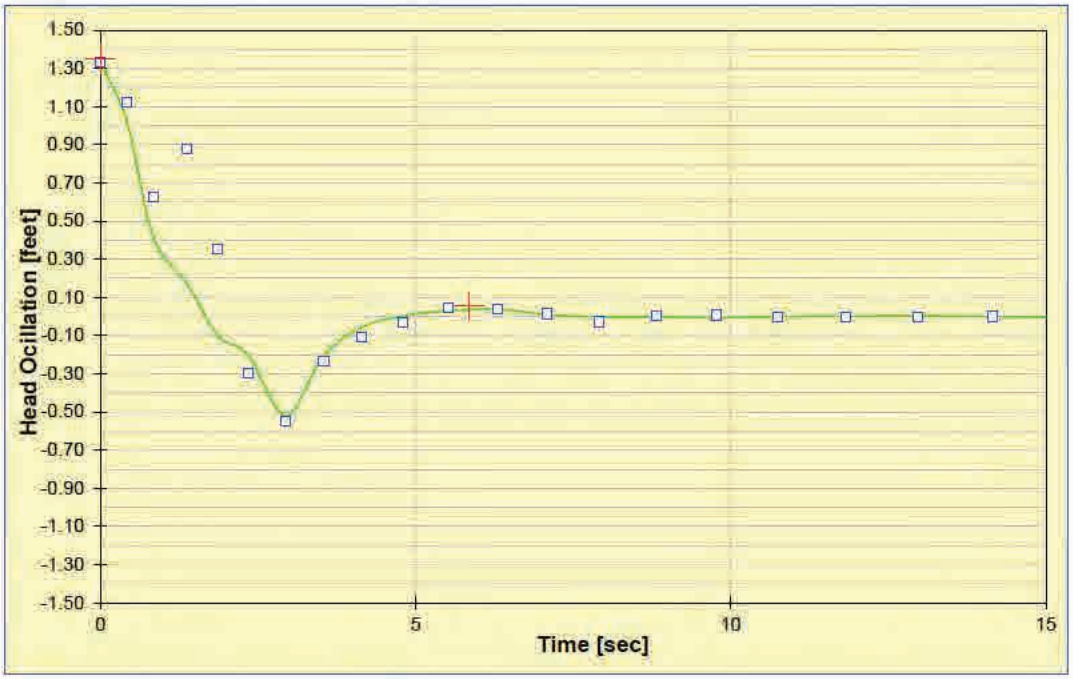
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma/(g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.20536	ft^2
r_s =	0.08	ft	d =	0.4539	ft^{-1}
L_c =	17.92	ft	a =	0.00231	ft^3
L_s =	10.00	ft	t_1 =	0.00	sec
w =	1.0740	ft^{-1}	t_2 =	5.85	sec
g =	0.5471	ft^{-1}	$h(t_1)$ =	1.35	ft
L =	22.16	ft^3/sec^2	$h(t_2)$ =	0.06	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.22E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.20E-02 ft^2/sec	$d < 0.7$?	YES
T =	1.04E+03 ft^2/day	L_1 =	22.16
K =	3.67E+01 ft/day	L_2 =	22.92
K =	1.29E-02 cm/sec	L_1:L_2 Diff <20% ?	YES



Project Name: NIPSCO RMSGS
Project No.: 164-8171
Test Date: 07/07/16

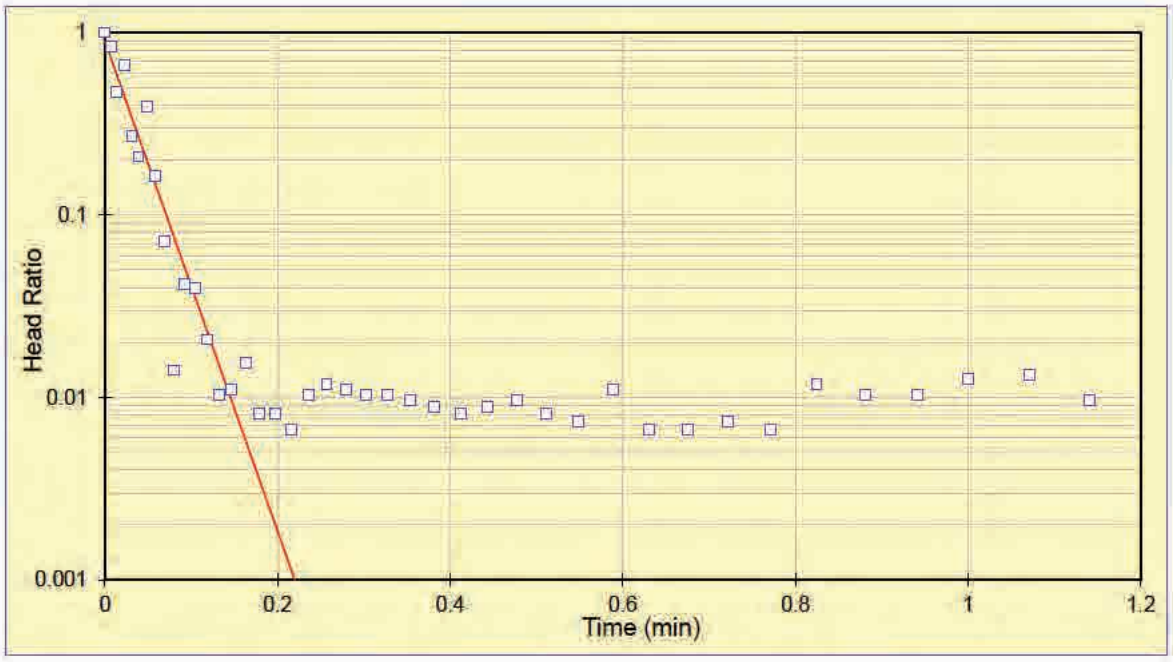
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.84E-02	cm/sec
t_1 =	0	K=	5.21E+01	ft/day
t_2 =	0.22			
h_1/h_0 =	0.90			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

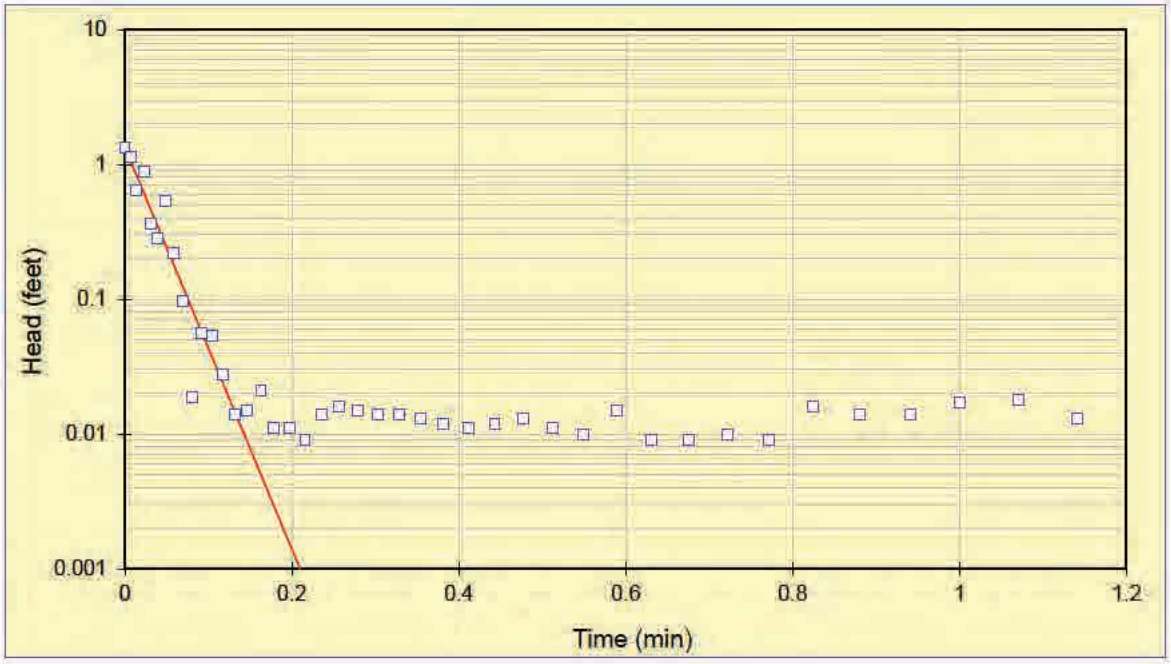
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.02
y_0 =	1.35
y_t =	0.001
t =	0.2

RESULTS

K=	1.83E-02	cm/sec
K=	5.18E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-19B (TEST 2)

$$T = b + a \ln T$$

where:

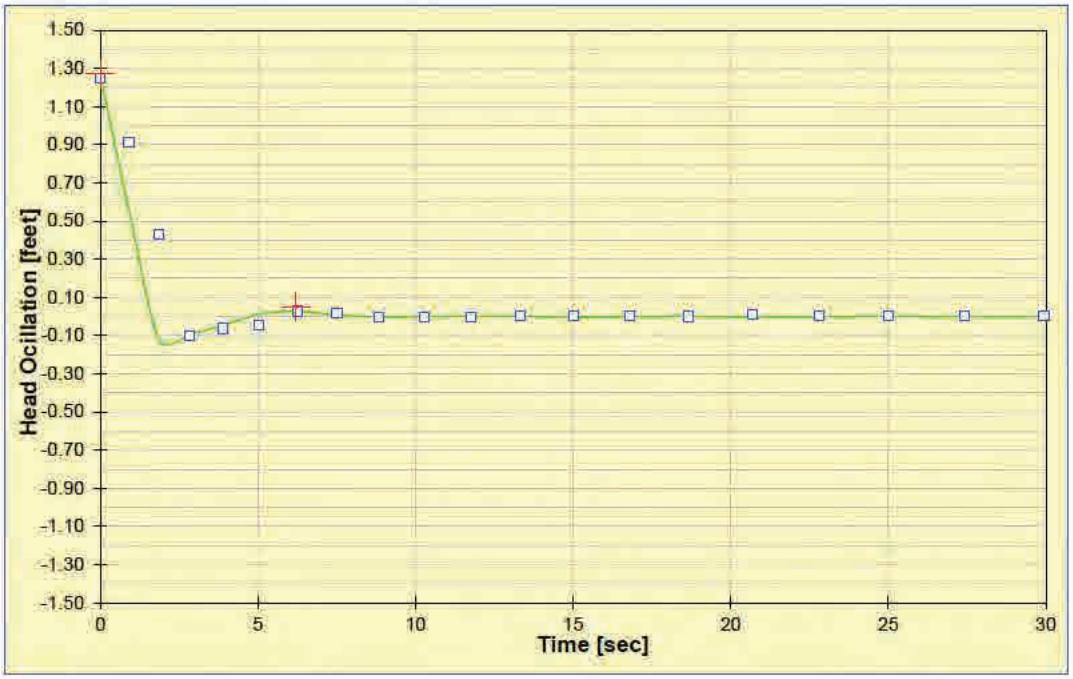
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma / (g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.13983	ft^2
r_s =	0.08	ft	d =	0.4577	ft^{-1}
L_c =	17.95	ft	a =	0.00216	ft^3
L_s =	10.00	ft	t_1 =	0.00	sec
w =	1.0134	ft^{-1}	t_2 =	6.20	sec
g =	0.5217	ft^{-1}	$h(t_1)$ =	1.27	ft
L =	24.78	ft^3/sec^2	$h(t_2)$ =	0.05	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.09E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.12E-02 ft^2/sec	$d < 0.7$?	YES
T =	9.69E+02 ft^2/day	L_1 =	24.78
K =	3.43E+01 ft/day	L_2 =	22.95
K =	1.21E-02 cm/sec	L_1:L_2 Diff <20% ?	YES



Project Name: NIPSCO RMSGS
Project No.: 164-8171
Test Date: 07/07/16

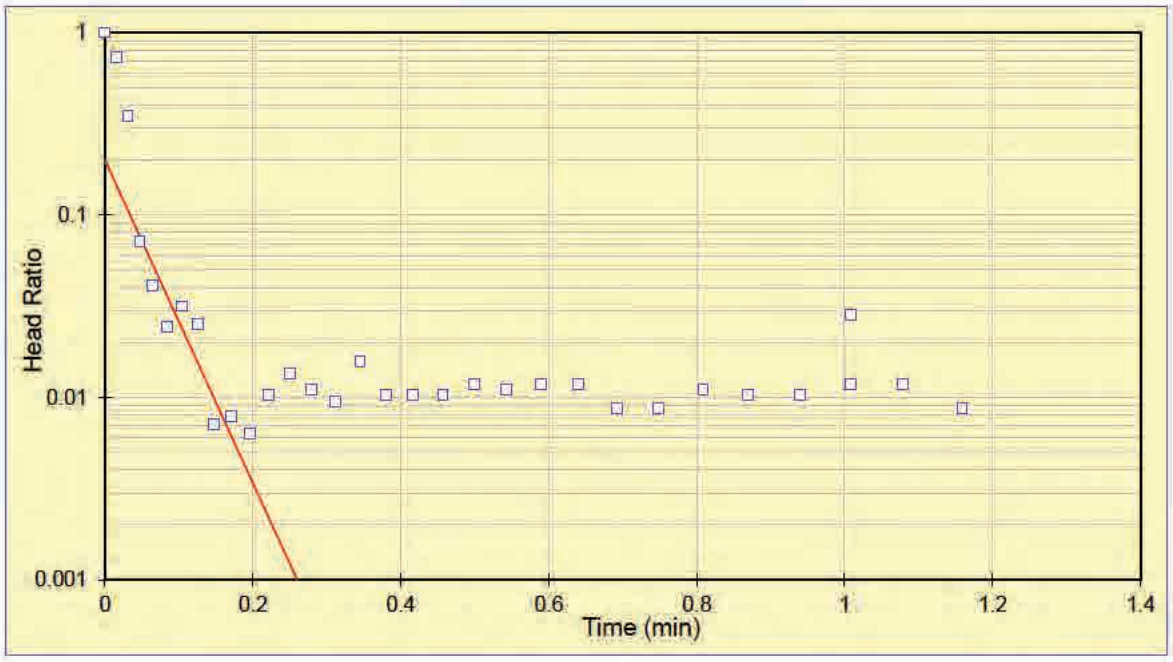
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.21E-02	cm/sec
t_1 =	0	K=	3.43E+01	ft/day
t_2 =	0.26			
h_1/h_0 =	0.20			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

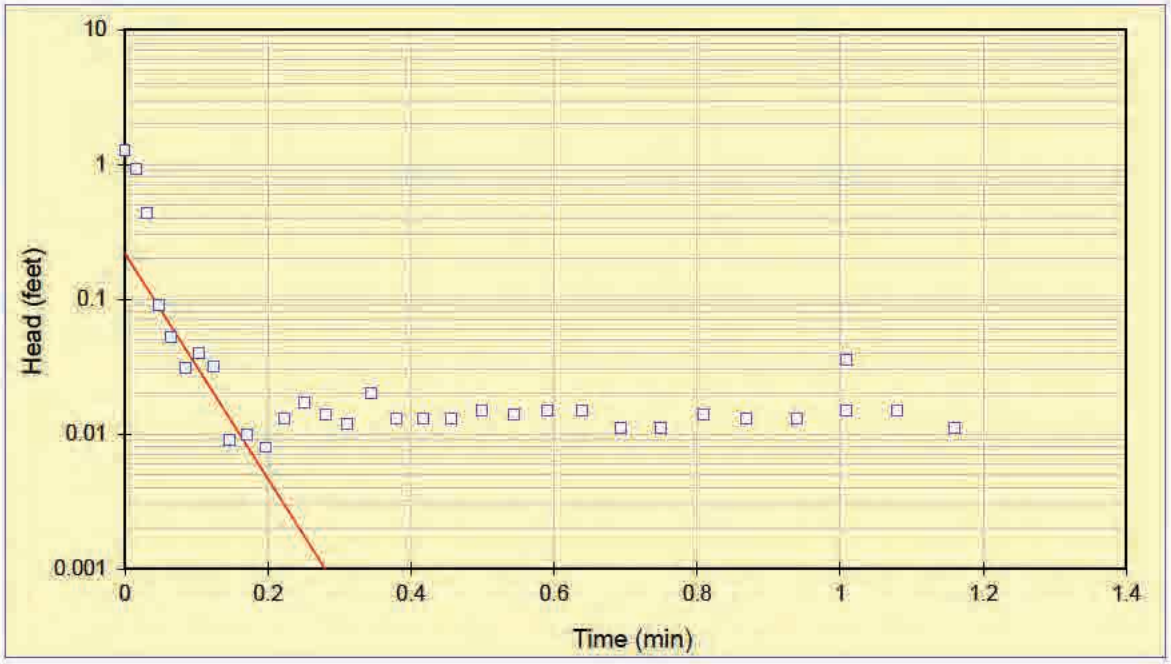
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.02
y_0 =	0.22
y_t =	0.001
t =	0.3

RESULTS

K=	1.03E-02	cm/sec
K=	2.91E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

APPENDIX C

Vertical Gradient Calculation

Appendix D
VERTICAL GRADIENT FLOW CALCULATIONS

Monitoring Well Locations	Ground Surface Elevation (ft-masl)	Top of Casing Elevation (ft-masl)	Screen Interval				June 13, 2016				July 11, 2016				September 9, 2016				November 2, 2016			
			Top (ft-bgs)	Bottom (ft-bgs)	Center (ft-bgs)	Center (ft-masl)	Depth To Water (ft-btoc)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-btoc)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-btoc)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-btoc)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction
GAWW01	993.02	993.94	5	15	10	983.02	10.77	983.17			10.84	983.10			10.85	983.09			11.00	982.94		
GAWW01B	993.01	993.93	20	40	30	963.01													11.04	982.90	-0.0018	Down
GAWW02	992.45	992.76	5	15	10	982.45	9.91	982.85							9.91	982.85			10.14	982.62		
GAWW02B	992.40	992.76	20	35	27	965.40													10.14	982.62	-0.0458	Down
GAWW03	992.16	992.49	5	15	10	982.16	9.62	982.54			10.29	981.89			9.11	983.04			9.52	982.63		
GAWW03B	992.16	992.54	24.5	34.5	29.5	962.66	9.75	982.54	-0.180-02	Down	9.81	982.48	-0.145-02	Down	8.15	983.11	-0.245-02	Down	9.68	982.67	-0.0459	Down
GAWW10	993.21	993.05	5	15	10	983.04	9.52	983.53			9.82	983.23			9.22	983.83			9.36	983.69		
GAWW10B	993.11	993.05	29.3	37.1	33.2	959.91	9.15	983.90	-0.417-03	Down	9.42	983.63	0.00E+00	Flat	9.18	983.87	1.67E-03	up	8.96	984.09	0.0000	up
GAWW11E	992.57	992.97	5	15	10	982.57	9.21	983.76	-0.00E-00	Down	9.61	983.36	1.46E-01	up	9.18	983.79	-0.45E-01	up	8.32	984.65	0.960-02	up
GAWW11B	992.70	992.76	70.76	74.71	72.74	919.96	8.91	983.85			8.80	983.96			7.91	984.85			8.64	983.13		
GAWW11C	993.01	992.80	5	15	10	983.01	9.19	983.61			9.29	983.51			10.05	982.75			9.25	983.55		
GAWW12B	992.83	993.05	28	38	33	957.83	10.79	982.26	-0.22E-03	up	9.77	983.28	0.61E-01	Down	10.05	982.99	4.22E-02	Down	10.23	982.81	0.23E-01	Down
GAWW16	993.74	994.07	5	15	10	983.74	9.75	983.99			9.96	983.77			9.44	984.29			9.80	983.93	0.90E-02	Down
GAWW16B	993.64	993.47	25	35	30	958.64	--	--			--	--			--	--			9.54	983.93		
GAWW18B	991.00	990.83	5	15	10	981.00	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	9.06	981.94	-0.11E-01	Down
GAWW19B	993.90	993.79	22	32	27	966.90	--	--			--	--			--	--			9.05	984.74		
GAWW20	994.27	993.72	5	15	10	984.27	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	9.06	984.66	1.66E-03	Up
GAWW20B	992.20	992.93	27	37	32	960.20	--	--			--	--			--	--			9.05	983.89		
GAWW53	991.89	991.54	5	15	10	981.89	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	8.85	983.04	1.42E-03	Up
GAWW53B	992.17	992.04	28	38	33	959.17	--	--			--	--			--	--			8.87	983.30		
GAWW54	992.97	992.57	5	15	10	982.97	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	9.05	983.92	1.81E-03	up
GAWW54B	992.99	992.67	32	42	37	955.99	--	--			--	--			--	--			8.87	984.12		
GAWW55	992.95	992.84	5	15	10	982.95	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	8.54	984.30	0.00E+00	Flat
GAWW55B	992.16	992.93	25	35	30	962.16	--	--			--	--			--	--			8.54	984.39		
GAWW56	992.43	992.61	5	15	10	982.43	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	7.90	984.71	-0.00E+00	Down
GAWW56B	992.35	992.84	30	40	35	957.35	--	--			--	--			--	--			7.90	984.77		

Notes:
ft-bgs = Feet below ground surface
ft-msl = Feet above mean sea level
ft-btoc = Feet below top of casing
NA = Not applicable

Monitoring Well Location	Ground Surface Elevation (ft-masl)	Top of Casing Elevation (ft-masl)	Screen Interval				January 4, 2017				February 21, 2017				April 24, 2017				June 26, 2017			
			Top (ft-bgs)	Bottom (ft-bgs)	Center (ft bgs)	Center (ft masl)	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction
GAMW07	991.15	993.94	5	15	10	981.15	10.08	983.86	1.10E-03	Down	9.85	984.09	1.07E-03	Down	9.85	984.09	NA	NA	9.80	984.14	NA	NA
GAMW07B	991.61	994.10	39	42	40	951.61	9.69	984.41			9.67	984.43			9.71	984.39			9.70	984.40		
GAMW08	992.45	995.15	5	15	10	982.45	10.60	984.55	1.64E-03	Up	10.63	984.52	2.61E-03	Down	9.71	985.44	NA	NA	10.15	984.99	NA	NA
GAMW08B	979.15	981.97	20	35	27	952.15	9.21	984.76			9.07	984.90			--	--	--	--	--	--	--	--
GAMW09	990.1	992.86	5	15	10	980.1	9.49	983.37	3.20E-03	Down	9.50	983.36	2.70E-03	Down	9.25	984.22	0.03E-03	Down	9.30	984.09	2.1E-03	Down
GAMW09B	993.19	995.94	34.5	44.5	39.5	953.69	9.85	984.81			9.81	984.85			9.26	985.40			9.80	985.21		
GAMW10	993.17	995.95	5	15	10	983.17	9.83	984.82	1.22E-03	Up	9.86	984.80	1.84E-03	Up	7.60	987.38	1.47E-03	Up	9.80	985.05	0.00E+00	NA
GAMW10B	993.18	995.95	37.5	47.5	42.5	950.68	9.13	984.82			9.11	984.84			8.77	985.24			9.80	985.35		
GAMW11	992.7	995.37	5	15	10	982.7	9.33	984.14	1.63E-03	Up	9.46	983.91	1.02E-03	Up	9.27	984.10	0.97E-03	Up	9.72	983.65	1.03E-03	Up
GAMW11B	992.76	995.76	47.76	52.76	50.26	942.50	9.71	984.05			9.70	984.06			9.34	984.42			9.68	984.08		
GAMW12	993.51	996.80	5	15	10	983.51	NA				11.24	984.36			11.35	984.25			11.31	984.43		
GAMW12B	994.13	997.0	35	45	40	959.13	11.60	984.53	0.0E+00	Up	11.54	984.59	0.00E+00	Up	11.60	984.53	0.00E+00	Up	11.58	984.55	1.56E-03	Up
GAMW13	993.74	996.57	5	15	10	983.74	9.68	984.11			9.84	983.95			9.48	984.31			9.85	983.72		
GAMW13B	993.14	995.47	25	35	30	963.64	9.62	984.04	6.2E-02	Down	9.61	984.05	0.0E+00	Down	--	--	--	--	--	--	NA	NA
GAMW14	991.09	993.63	5	15	10	981.09	9.75	983.53			9.84	983.70			--	--	NA	NA	--	--		
GAMW14B	990.80	993.76	22	32	27	963.80	9.75	984.04	-3.0E-04	Down	9.69	984.10	1.93E-04	Up	--	--			--	--	NA	NA
GAMW15	994.27	996.93	5	15	10	984.27	9.77	984.14			9.76	984.15			--	--	--	--	--	--		
GAMW15B	992.20	994.83	37	47	42	950.20	9.78	984.14	9.1E-03	Up	9.80	984.12	2.05E-03	Up	--	--	NA	NA	--	--	NA	NA
GAMW16	990.80	993.24	5	15	10	980.80	9.55	983.79	4.1E-03	Up	9.61	983.73	2.37E-03	Up	--	--	NA	NA	--	--	NA	NA
GAMW16B	990.91	993.53	26	36	31	954.91	9.85	983.78			9.81	983.82			--	--	--	--	--	--		
GAMW17	992.07	995.01	5	15	10	982.07	9.58	985.53	3.92E-03	Up	9.61	985.50	3.80E-03	Up	--	--	NA	NA	--	--	NA	NA
GAMW17B	992.09	994.67	32	42	37	955.09	9.62	985.05			9.61	985.06			--	--	--	--	--	--		
GAMW18	990.05	992.84	5	15	10	980.05	9.62	983.22	1.5E-03	Down	9.81	983.03	1.6E-03	Down	--	--	NA	NA	--	--	NA	NA
GAMW18B	988.16	990.93	25	35	30	958.16	9.81	983.12			9.76	983.17			--	--	--	--	--	--		
GAMW19	990.23	992.91	5	15	10	980.23	9.73	983.18	1.0E-03	Down	9.85	983.06	4.6E-03	Down	--	--	NA	NA	--	--	NA	NA
GAMW19B	988.33	990.91	30	40	35	953.33	9.77	983.14			9.80	983.11			--	--	--	--	--	--		

Notes:
Bold = Well located in groundwater mound
Italic = Well above mound (sump well)
Bold + Italic = Well below mound (sump well)
NA = Not Available
*Min = Minimum detected

Appendix C
VERTICAL GRADIENT FLOW CALCULATIONS

Monitoring Well Locations	Ground Surface Elevation (ft-masl)	Top of Casing Elevation (ft-masl)	Screen Interval				August 21, 2017				October 2, 2017				February 26, 2018				March 12, 2018			
			Top (ft-bgs)	Bottom (ft-bgs)	Center (ft bgs)	Center (ft masl)	Depth To Water (ft-bgs)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bgs)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bgs)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bgs)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction
GAMW09	993.02	993.94	5	15	10	983.02	10.92	983.02	NA	NA	10.75	983.19	NA	NA	–	–	NA	NA	9.8	984.06	NA	NA
GAMW09R	994.67	995.02	290	40	35	959.67	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW08	992.45	992.76	5	15	10	982.45	10.10	982.53	NA	NA	NA	–	NA	NA	–	–	NA	NA	9.38	983.38	NA	NA
GAMW08B	979.52	980.40	20	35	27	952.52	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW04	992.1	992.96	5	15	10	982.01	9.11	983.85	0.0018/0.02	Down	10.25	982.85	0.0015/-0.02	Down	–	–	NM	NM	9.29	983.67	-0.1/-0.02	Down
GAMW08R	993.19	993.56	294.5	345	319.5	674.69	1.65	991.91			9.81	983.38			–	–			9.92	983.27		
GAMW10	993.01	993.95	5	15	10	983.01	9.66	984.29	0.0027/-0.02	Up	9.80	984.21	0.0028/-0.02	Up	–	–	NM	NM	9.36	984.59	0.0022/-0.02	Up
GAMW10B	993.14	993.95	27.5	37.5	32.5	960.64	7.33	986.62			8.47	985.48			–	–			7.96	985.99		
GAMW11	992.0	992.97	5	15	10	982.0	9.15	982.85	0.0024/0.02	Up	10.68	982.32	0.0028/0.02	Up	–	–	NM	NM	9.36	982.64	0.0022/0.02	Up
GAMW10A	992.16	992.76	170.16	181.75	175.96	816.20	7.64	984.96			9.87	982.82			–	–			8.07	984.62		
GAMW11B	993.51	994.83	5	15	10	983.51	10.34	984.49			NA				–	–			10.45	984.38		
GAMW12B	993.63	993.0	35	55	45	948.63	10.95	982.05	0.0006/-0.02	Down	12.23	980.77			–	–			9.12	984.18	0.0005/-0.02	Up
GAMW12	993.74	994.19	5	15	10	983.74	9.23	984.51			11.73	982.00			–	–			9.8	983.93		
GAMW10B	993.14	993.47	25	35	30	963.64	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
TW09MW01	991.00	992.69	5	20	13	977.00	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA
GAMW09B	993.80	993.76	22	32	27	966.80	–	–	–	–	–	–	–	–	–	–	NM	NM	–	–	–	–
GAMW09A	994.27	994.10	5	15	10	984.27	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA
GAMW05B	992.20	992.93	37	57	52	940.20	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW05	992.80	992.24	5	15	12	982.80	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA
GAMW05B	992.47	992.19	26	36	31	962.80	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW04	992.97	992.57	5	15	13	982.97	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA
GAMW04B	992.99	992.47	32	42	37	955.99	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW06	992.05	992.34	5	15	10	982.05	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA
GAMW06B	992.18	992.53	25	35	30	962.18	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW07	992.03	992.51	5	15	10	982.03	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA	–	–	NA	NA
GAMW07B	992.33	992.84	35	45	40	952.33	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–

Notes:
ft-bgs = Feet below ground surface
ft-masl = Feet above mean sea level
ft-bgsc = Feet below top of casing
NA = Not applicable
NM = Not measured

Monitoring Well Location	Ground Surface Elevation (ft-asl)	Top of Casing Elevation (ft-asl)	Screen Interval				April 13, 2016				June 12, 2016				August 27-30, 2016				October 22-24, 2016			
			Top (ft-bgs)	Bottom (ft-bgs)	Center (ft-bgs)	Center (ft-asl)	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-asl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-asl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-asl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-asl)	Vertical Gradient (m/m)	Flow Direction
GAMW09	691.62	693.94	5	15	10	681.62	9.99	683.95	7.70E-01	Up	9.70	684.24	1.71E-01	Up	9.95	683.99	3.43E-01	Up	10.07	683.87	1.71E-01	Up
GAMW09B	691.67	693.93	39	49	44	647.67	9.32	684.61			9.30	684.63			9.58	684.35			10.17	683.76		
GAMW08	692.45	694.76	5	15	10	682.45	9.84	684.92	1.03E-01	Up	9.60	685.17	1.03E-01	Up	12.32	682.45	1.20E-03	Up	11.16	683.62	2.56E-01	Up
GAMW08B	692.52	694.82	40	50	45	647.52	9.79	685.03			9.80	685.02			9.84	684.98			9.95	684.87		
GAMW06	690.1	692.56	5	15	10	680.1	7.42	685.14	2.07E-02	Down	7.5	685.06	2.15E-02	Down	9.52	683.04	2.04E-02	Down	8.66	683.90	2.04E-02	Down
GAMW06B	690.19	692.76	49.5	54.5	52	638.19	7.14	685.62			7.25	685.51			9.15	683.61			8.29	684.47		
GAMW15	693.07	695.25	5	15	10	683.07	9.83	685.42			9.8	685.45			9.58	685.67			8.93	686.31		
GAMW15B	693.11	695.08	29.1	37.1	33.1	660.01	7.4	687.68	9.63E-03	Up	8.85	686.26	1.04E-02	Up	8.93	686.18	1.93E-02	Up	8.002	687.11	1.77E-02	Up
GAMW16	692.07	693.97	5	15	10	682.07	8.15	685.82	5.59E-03	Up	8.36	685.61	9.14E-03	Up	9.95	684.02	1.72E-03	Up	8.7	685.27	2.14E-03	Up
GAMW16B	692.13	693.76	47.16	54.71	50.76	641.84	6.45	687.31			7.5	686.26			9.24	684.52			8.65	685.10		
GAMW17	693.51	695.83	5	15	10	683.51	11.35	684.48			11.45	684.38			11.66	684.17			10.7	685.13		
GAMW17B	693.63	695.6	35	45	40	653.63	10.42	685.18	4.98E-03	Up	10.23	685.38	5.00E-03	Up	10	685.6	2.11E-03	Down	9.43	686.18	2.11E-03	Down
GAMW18	693.74	695.57	5	15	10	683.74	9.47	686.1			9.72	685.85			9.98	685.59			8.7	686.87		
GAMW18B	693.64	695.47	25	35	30	663.64	9	686.47	1.39E-03	Up	8.93	686.71	1.93E-03	Up	9.28	686.36	1.11E+00	Up	8.32	687.32	2.89E-03	Up
GAMW07	691.09	692.63	5	15	10	681.09			NA	NA	7.07	685.56	-1.55E-04	Down	9.14	683.52	-1.03E+00	Down	8.29	684.37	-1.03E+00	Down
GAMW08	690.93	692.74	22	32	27	674.08	–	–			7.06	685.87			9.24	683.56			8.39	684.42		
GAMW10	694.27	696.13	5	15	10	684.27	–	–	–	–	–	–	–	–	9.55	686.58	–	–	9.06	687.07	–	–
GAMW10B	694.29	696.13	37	47	42	652.29	–	–	NA	NA	–	–	0.0	NA	9.55	686.58	0.00E+00	No	9.06	687.07	0.00E+00	No
GAMW05	690.39	692.24	5	15	10	680.39	–	–	NA	NA	7.03	685.21	1.72E-02	Up	8.85	683.44	5.67E-03	Up	8.10	684.19	1.15E-02	Up
GAMW05B	690.41	692.24	26	36	31	659.41	–	–			7.05	685.19			8.77	683.47			9.05	685.19		
GAMW04	692.97	695.37	5	15	10	682.97	7.23	–	–	–	7.05	688.32	–	–	7.58	687.79	–	–	7.09	688.27	–	–
GAMW04B	693.02	695.47	32	42	37	656.98	7.32	688.15	1.83E-03	Up	7.07	688.40	9.47E-03	Up	7.72	687.75	3.81E-03	Down	6.92	688.52	3.81E-03	Down
GAMW05	690.05	691.94	5	15	10	680.05	–	–	NA	NA	6.84	685.09	3.02E-02	Up	9.01	682.92	2.93E-03	Down	6.93	685.01	3.04E-03	Down
GAMW06	695.16	697.03	35	45	40	655.16	–	–			6.86	690.17			9.03	688.00			6.95	690.08		
GAMW06B	695.23	697.01	5	15	10	685.23	–	–	NA	NA	6.84	690.17	-9.68E-04	Down	9.06	687.78	1.93E-03	Up	6.93	690.06	1.93E-03	Up
GAMW07	695.33	697.31	37	47	42	653.33	–	–			7.05	690.26			9.03	688.28			6.93	690.38		

Notes:
Bold = Well screen groundwater head
Italics = Well screen mean sea level
Italics = Calculation Result
NM = Not Measured
NA = Not Available

Appendix C
VERTICAL GRADIENT FLOW CALCULATIONS

Monitoring Well Locations	Ground Surface Elevation (masl)	Top of Casing Elevation (masl)	Screen Interval				February 23, 2016				Average Vertical Gradient (m/m)	Flow Direction
			Top (m bgs)	Bottom (m bgs)	Center (m bgs)	Center (masl)	Depth To Water (m BTOC)	Groundwater Elevation (masl)	Vertical Gradient (m/m)	Flow Direction		
DMW07	1000.23	999.95	5	10	7.5	992.45	10.55	989.40				
DMW10S	999.61	999.33	10	13	11.5	988.11	8.33	991.28	0.05E-02	Up	0.0030	Up
DMW11S	999.95	999.66	5	11	8	991.95	8.61	991.05				
DMW11D	999.92	999.61	45	51	48	951.95	8.13	991.48	0.00E+00	Up	0.0031	Up
DMW12S	1001.1	1000.99	7	13	10	991.10	9.05	991.21				
DMW12D	999.83	999.53	84.5	91.5	88.0	911.83	8.48	991.47	-0.04E-02	Down	-0.0214	Down
DMW13	999.07	998.79	5	10	7.5	991.57	7.68	991.39				
DMW15S	998.1	998.06	37.9	47.3	42.6	955.46	7.07	991.04	0.03E-02	Up	0.0018	Up
DMW15I	998.2	998.10	5	13	9	989.17	8.20	989.94				
DMW15D	998.19	997.79	97.79	99.16	98.78	899.04	8.22	989.61	0.03E-02	up	0.0020	Up
DMW16	998.81	998.43	5	15	10	988.81	11.84	986.27				
DMW17S	997.96	997.6	24	34	29	968.96	12.35	985.44	-0.23E-02	Down	-0.0111	Down
DMW17I	998.03	997.77	5	15	10	988.03	8.84	987.35				
DMW18S	999.04	998.47	25	33	29	970.04	6.55	992.22	0.10E-02	Up	0.0050	Up
DMW18D	997.90	997.49	81	91	86	911.90	5.96	991.93				
DMW19S	991.46	991.79	22	32	27	964.46	7.93	991.08	-0.05E-02	Up	-0.0193	Down
DMW19I	994.01	993.73	5	15	10	984.01	8.10	990.99				
DMW20S	993.60	993.33	25	30	32	962.57	8.29	990.30	0.02E-02	Up	0.0009	Up
DMW21	994.68	991.24	5	15	10	984.68	8.48	990.70	0.02E-02	Up	0.0008	Up
DMW22S	993.65	991.39	25	35	31	963.65	9.05	990.94				
DMW22I	993.89	993.21	5	15	10	988.89	8.09	990.96	0.02E-02	Down	0.0004	Up
DMW23S	993.06	992.47	55	65	60	938.06	7.98	990.37				
DMW23I	992.99	992.68	5	15	10	982.99	8.65	990.61	0.00E+00	Up	0.0002	Down
DMW23D	993.05	992.63	75	85	80	918.05	7.93	990.71				
DMW24S	991.62	991.3	5	15	10	981.62	7.91	990.70	0.00E+00	Down	0.0001	Down
DMW24D	991.55	991.42	75	85	80	911.55	7.93	990.70				

Notes:
Mbgs = Meters below ground surface
Masl = Meters above mean sea level
mBTOC = Meters below top of casing
BGL = Feet Below
NA = Not available

Prepared by: EMW
Checked by: TV
Reviewed by: MAH

APPENDIX D

Monitored Natural Attenuation Evaluation

GOLDER

REPORT

MONITORED NATURAL ATTENUATION EVALUATION

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November 2020

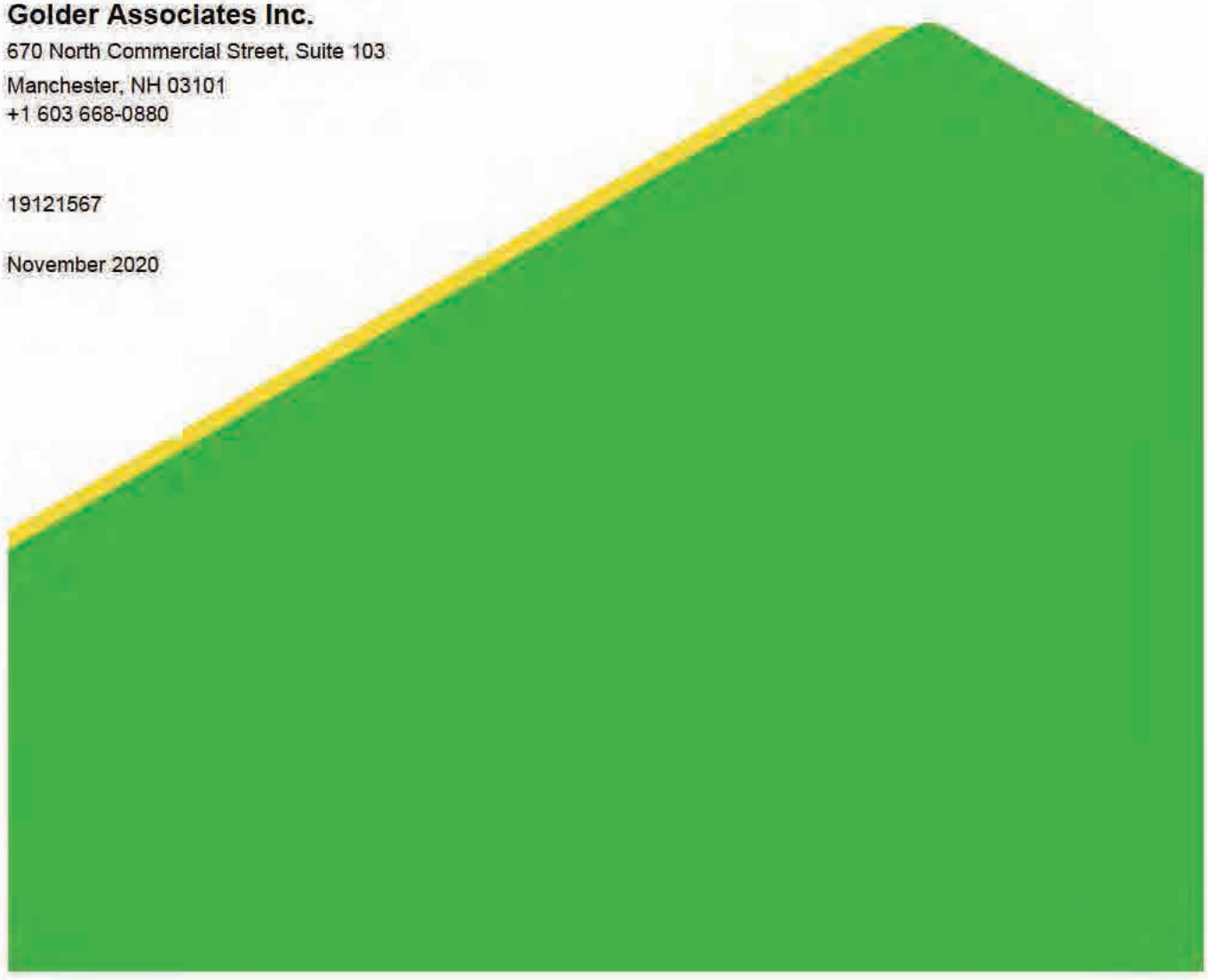


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APPENDICES

APPENDIX A
Groundwater and Porewater Monitoring Data

APPENDIX B
Groundwater Flow Model Technical Memorandum

Acronyms

ACM	Assessment of Corrective Measures
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
DO	Dissolved Oxygen
Eh	Reduction Potential
ft bgs	feet below ground surface
g	Gram
GMPIM	Groundwater Monitoring Program Implementation Manual
GWPS	Groundwater Protection Standards
IAP	Ion Activity Product
IDEM	Indiana Department of Environmental Management
ITRC	Interstate Technology Regulatory Council
kg	kilogram
Ksp	Solubility Product
MCL	Maximum Contaminant Level
MCWB	Metal Cleaning Waste Basin
mg	milligram
mg/L	milligram per liter
MNA	Monitored Natural Attenuation
mV	millivolt
MSRB	Material Storage Runoff Basin
NIPSCO LLC	Northern Indiana Public Service Company LLC
ORP	Oxidation-Reduction Potential
RMSGS	R. M. Schahfer Generating Station
SCM	surface complexation model
SEP	Sequential Extraction Potential
SI	Saturation Index
SSL	Statistically Significant Level
SU	Standard Unit
TAL	Target Analyte List
TDS	Total Dissolved Solids
USEPA	United States Environmental Protection Agency
XRD	X-ray diffraction

1.0 OVERVIEW

Groundwater and solid materials were evaluated to determine the feasibility of Monitored Natural Attenuation (MNA) as part of the assessment of corrective measures process for the Coal Combustion Residuals (CCR) surface impoundments (i.e., Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and the Drying Area (together, the CCR Unit) at the Northern Indiana Public Service Company LLC (NIPSCO LLC) Rollin M. Schahfer Generating Station (RMSGS, or Site). The structure of this feasibility evaluation closely follows the United States Environmental Protection Agency (USEPA) guidance on using MNA as a remedial strategy (USEPA 2007a and 2007b) and considers best practices from the Interstate Technology Regulatory Council (ITRC) document: “A Decision Framework for Applying Monitored Natural Attenuation Processes to Metals and Radionuclides in Groundwater” (ITRC 2010).

RMSGS manages CCR in the surface impoundments subject to applicable requirements of 40 Code of Federal Regulations (CFR) Part 257 as amended (CCR Rule). In April 2019, pursuant to 40 CFR §257.96(a), an assessment of corrective measures (ACM) was completed for the CCR Unit. This evaluation identified MNA as a potential remedial alternative for cobalt due to a detection at a Statistically Significant Level (SSL) in groundwater. Additionally, arsenic, boron, lithium, and molybdenum were evaluated as part of this assessment due to the potential for future SSLs, should they ever occur. The results of the evaluation will be used to assess the performance and reliability of MNA as a potential remedial alternative as required by 40 CFR §257.97, Golder determined the overall feasibility of MNA for the CCR Unit by evaluating the following tiers (USEPA 2007a,b):

1) Demonstrate active constituent removal from groundwater and dissolved plume stability (Tier I)

2) Determine the mechanisms and rates of the operative attenuation processes (Tier II)

3) Determine the long-term capacity for attenuation and the stability of immobilized constituents (Tier III)

Following completion of this multi-tier evaluation, the fourth and final tier of an MNA program, which involves the design of a performance monitoring program and the development of a contingency plan, will be developed.

2.0 APPROACH

Golder evaluated the feasibility, mechanisms, rates, and stability of MNA as a remedy for groundwater impacts from the CCR Unit. In order to perform the evaluation, Golder collected samples of groundwater and overburden soil between July 24, 2018 and March 3, 2020 for geochemical analysis. The supplemental MNA assessment included the following activities:

- Groundwater:
  - Characterization to identify temporal and geographical trends, where present, and to estimate site-wide attenuation rates using temporal and spatial trends in groundwater quality data.
  - Geochemical modeling to identify the major chemical species and evaluate saturation indices of minerals relevant to attenuation of arsenic, boron, cobalt, lithium, and molybdenum.
  - Determination of the capacity of different mechanisms to attenuate arsenic, boron, cobalt, lithium, and molybdenum, including adsorption, precipitation and co-precipitation, and physical attenuation (dilution/dispersion).
  - Geochemical modeling to assess the stability and reversibility of attenuation due to adsorption.

- Overburden soil:
  - Mineralogical analysis of overburden soils to identify and quantify the major mineral components.
  - Chemical analysis of overburden soils to quantify the total metal content and identify the environmentally-available fraction of metals.

The results generated by this supplemental assessment were used by Golder to complete the Tier I, Tier II, and Tier III evaluation (USEPA 2007a,b). In addition, groundwater data collected during previous sampling events were used. The results of the Tier I, Tier II, and Tier III are described in the subsequent sections to establish a basis for the likely success of MNA at the RMSGS site.

2.1 Groundwater and Porewater Sampling

2.1.1 Sample Collection

Golder personnel collected groundwater and porewater samples in accordance with the Golder RMSGS Groundwater Monitoring Program Implementation Manual (GMPIM, Golder 2017) from the background, downgradient, Assessment, and property boundary monitoring wells presented in Table 1, and from piezometers located within the CCR Unit. Piezometer GAPIEZ-06 is located interior of the slurry wall on the western edge of the MSRB and is screened within the CCR materials. Piezometers DAPZ-02A and DAPZ-02B (abandoned in April 2020) were installed interior of the slurry wall on the eastern edge of the Drying Area and were screened in native materials (i.e., below the extent of CCR) from approximately five to 20 feet below ground surface (ft bgs) and 33 to 38 ft bgs, respectively. The monitoring well and former piezometer locations are shown in Figure 1.

Table 1: Overview of the Wells Used in the Monitored Natural Attenuation Assessment

Background Wells	Downgradient Wells	Assessment Wells	Property Boundary Wells
GAMW-04, GAMW-07, GAMW-07B, GAMW-15, GAMW-15B	GAMW-08, GAMW-08B, GAMW-09, GAMW-09B, GAMW-16, GAMW-16B, GAMW-17, GAMW-17B, GAMW-18, GAMW-18B	GAMW-52, GAMW-52B, GAMW-53, GAMW-53B, GAMW-54, GAMW-54B, GAMW-55/55R, GAMW-55B, GAMW-56, GAMW-56B	GAMW-46, GAMW-46B

2.1.2 Groundwater and Porewater Analysis

The geochemical characterization of porewater and groundwater samples included the measurement of field parameters and the laboratory analysis of samples for total metals and major cations and anions. The field parameters and laboratory analyses included:

Field Parameters: Parameters measured in the field included pH, dissolved oxygen (DO), oxidation reduction potential (ORP), conductivity, and temperature. These measurements were used to determine general geochemical conditions in the groundwater and support geochemical modeling.

Metals: Analysis of Appendix III and IV metals concentrations was conducted to understand the geochemical composition of groundwater and porewater. Metals analysis allows for the delineation of a potential plume, evaluation of mineral saturation indices, development of partitioning coefficients (in conjunction with solid material analyses), and evaluation of background contributions from natural sources or anthropogenic sources.

Major Cations and Anions: Geochemical modeling of mineral solubility, metals attenuation and background contributions requires analysis of major cations and anions because they affect and participate in sorption and mineral dissolution or precipitation reactions.

The groundwater and porewater samples were analyzed using the following methods:

- pH following SW846 9040C “pH Electrometric Measurement” (USEPA 2004)
- Total dissolved solids standard method (SM) 2540C “Total Dissolved Solids Dried at 180°C” (USEPA 1993a)
- Total hardness following SM 2340B (USEPA 1997)
- Chloride, fluoride, and sulfide following USEPA SW846 9056A “Determination of Inorganic Anions by Ion Chromatography”, Revision 1 (USEPA 2007c)
- Nitrate and nitrite following USEPA 353.2 “Determination of Nitrate-Nitrite Nitrogen by Automated Colorimetry, Revision 2.0” (USEPA 1993b)
- Alkalinity following SM 2320B “Alkalinity by Titration” (USEPA 2005a)
- Phosphorous following SM 4500-P E “Phosphorous by Ascorbic Acid Method” (USEPA 2005b)
- Total Target Analyte List (TAL) metals following USEPA SW846 6010C “Inductively Coupled Plasma-Atomic Emission Spectrometry”, Revision 3, SW846 6020B “Inductively Coupled Plasma-Mass Spectrometry”, Revision 2, and SW846 6020A “Inductively Coupled Plasma-Mass Spectrometry”, Revision 1 (USEPA 1998a)

2.2 Overburden Soil Sampling and Analysis

2.2.1 Sample Collection

Golder subcontracted a licensed well driller to advance borings into the overburden soil and install monitoring wells using roto sonic drilling methods. During boring operations, the driller collected continuous drill cores from all deep wells (i.e.” B” flagged wells). From the drill cores, Golder staff collected overburden samples from the depth of the screened intervals (i.e. 10-foot screened interval) from one background well soil boring (SB-07B), two downgradient well soil borings (SB-08B and SB-18B) and from five Assessment Monitoring well soil borings (SB-52B, SB-53B, SB-54B, SB-55B, and SB-56B). Golder staff also collected an additional sample from SB-53B (25’-27’) at the top of the screened interval due to minor unidentified visual soil staining encountered within the planned interval itself. An additional soil boring was completed just external to the slurry wall on the eastern side of the MCWB (OW-9) and samples were collected on approximately 10-foot intervals.

The driller used a “marsh buggy” with a hollow stem auger drill rig specifically designed to work in the wet, soft soil/ash conditions inside the CCR Unit to advance eight soil borings within the Drying Area. From these eight borings, 23 samples were analyzed for total metals with one of these samples (DA-14_4-6’) also analyzed using the 7-step sequential extraction. The only sample for which data are included in this report is DA-14_4-6’; all other data, which were obtained for other purposes, are provided in the Ash Pond Assessment Report (Golder 2020).

Soil borings were numbered to match the equivalent monitoring wells, where applicable. Golder field staff prepared a composite overburden sample from boreholes by selecting a two-foot interval from each drill core and submitting it to the laboratory for analysis under chain-of-custody procedures. The unique descriptions used to

identify the samples included the boring name and depth of the sample below ground surface (e.g., SB-07B-35'-37'). The sample type and analytical testing conducted on each sample are provided in Table 2.

Table 2: Summary of Overburden Soil Samples/Analyses

Sample Location	Number of Samples	Analyses
Background boring (SB-07B) 35'-37'	1	Total metals, sequential extraction
Downgradient boring (SB-08B) 30'-32'	1	Total metals, sequential extraction
Downgradient boring (SB-18B) 32'-34'	1	Total metals, sequential extraction
Assessment boring (SB-52B) 35'-37'	1	Total metals, sequential extraction, mineralogical composition
Assessment boring (SB-53B) 25'-27' & 30'-32'	2	Total metals, sequential extraction
Assessment boring (SB-54B) 30'-32'	1	Total metals, sequential extraction, mineralogical composition
Assessment boring (SB-55B) 30'-32'	1	Total metals, sequential extraction
Assessment boring (SB-56B) 30'-32'	1	Total metals, sequential extraction, mineralogical composition
Downgradient boring (OW-9) 10'-12' & 18'-20'	2	Total metals, sequential extraction, mineralogical composition
Drying area boring (DA-14) 4'-6'	1	Total metals, sequential extraction

2.2.2 Overburden Soil Analyses

Multiple geochemical methods were used to assess the mineralogical and chemical composition of the overburden soil samples. The selected geochemical test methods included the following:

- **Mineralogical composition:** The mineralogical analysis was used to identify and quantify the crystalline mineral phases in each sample. This information is required for geochemical modeling as the release or attenuation of constituents of interest is influenced by the mineral phase(s) present in the aquifer (Hem 1985). The mineralogical testing laboratory (SGS Minerals Services) performed the mineralogical analysis using quantitative (Rietveld) X-ray diffraction (XRD) and a Bruker AXS D8 Advance Diffractometer.
- **Total metals:** This analysis was used to quantify the chemical composition of overburden soils. The total mass of metals, in combination with the results of sequential extraction testing, can be used to determine the provenance of metals and verify sequential extraction results. The laboratory analyzed a target analyte list of

metals following the methods USEPA SW846 6010C “Inductively Coupled Plasma-Atomic Emission Spectrometry”, Revision 3 (November 2000) and USEPA SW846 7471B “Mercury in Solid or Semisolid Wastes (Manual Cold-Vapor Technique)”, Revision 2.

- **Sequential extraction:** The sequential extraction procedure (SEP) consisted of a seven-step procedure to extract metals from solids, as per Tessier et al. (1979), to identify the provenance of constituents of interest (i.e. the operationally-defined fraction that contains the metal)[1] and determine their potential environmental mobility. For instance, metals bound in the carbonate fraction, or that are exchangeable, are much more likely to become mobile due to changes in groundwater conditions than metals bound within a sulfide or silicate fraction. The summed concentration of a metal measured from all seven steps (SEP SUM) can be compared to the concentration determined from a total metals analysis (SEP Total) for compositional accountability. The laboratory analyzed the metals content of the extracted samples using the method USEPA SW846 6020B “Inductively Coupled Plasma-Mass Spectrometry”, Revision 2 (July 2014).

2.3 Groundwater Assessment Monitoring

Following the installation of a groundwater monitoring system in 2016 and throughout calendar year 2017, Golder collected background groundwater samples and performed Detection Monitoring around the CCR Unit pursuant to the requirements of 40 CFR §257.94. In 2018, Golder performed the first and second Assessment Monitoring sampling events pursuant to the requirements of 40 CFR §257.95. Following the first Assessment Monitoring sampling event, including verification sampling, the constituents that were detected above the groundwater protection standards (GWPS) at SSLs included:

- Cobalt and Lithium at GAMW-08
- Molybdenum at GAMW-18

The GWPS is the larger value of the Maximum Contaminant Level (MCL) or the unit-specific background concentration for each analyte based on a tolerance/prediction limit statistical procedure. However, USEPA amended the CCR Rule (i.e., Phase 1 Part 1 amendment) and created health-based standards for cobalt, lead, lithium, and molybdenum, constituents that do not have MCLs, as of August 29, 2018. Pursuant to 40 CFR §257.95(h)(2), the health-based standards can be used in place of background levels to calculate the GWPS. Consequently, after the second Assessment Monitoring event (October 2018), cobalt in monitoring well GAMW-08 remained as the only constituent detected at an SSL. Arsenic has never been detected above the GWPS or at an SSL, however, Golder also assessed arsenic as part of this evaluation due to sporadic detections at or above the MCL.

[1] Sequential extraction of metals from overburden samples consisted of seven discrete steps for this investigation:

Step 1 - Exchangeable Phase: This extraction includes trace elements that are revers bly adsorbed to overburden minerals, amorphous solids, and/or organic material by electrostatic forces.

Step 2 - Carbonate Phase: This extraction targets trace elements that are adsorbed or otherwise bound to carbonate minerals.

Step 3 – Non-Crystalline Materials Phase: This extraction targets trace elements that are complexed by amorphous minerals (e.g., iron).

Step 4 - Metal Hydroxide Phase: Trace elements bound to hydroxides of iron, manganese, and/or aluminum.

Step 5 - Organic Phase: This extraction targets trace elements strongly bound via chemisorption to organic material.

Step 6 - Acid/Sulfide Fraction: The extraction is used to identify trace elements precipitated as sulfide minerals.

Step 7 - Residual Fraction: Trace elements remaining in the overburden after the previous extractions will be distributed between silicates, phosphates, and refractory oxides.

Although boron is not currently an Appendix IV constituent, USEPA is reportedly considering adding it to the Appendix IV list. The Indiana Department of Environmental Management (IDEM) has, however, established a health-based standard as part of the state cleanup program. Boron is frequently used as a tracer to indicate the extent of a release from a CCR management unit. Due to these characteristics and as a conservative measure, boron was selected by Golder to assess the nature and extent of groundwater impacts at the Site.

The health-based standards, unit-specific background concentration, and groundwater protection standards used in this evaluation are summarized in Table 3.

Table 3: Summary of Health-Based Standards, Background Concentrations, and Groundwater Protection Standards for the Constituents of Interest

Constituent	Health-Based Standard (mg/L)	Background Concentration (mg/L)	Groundwater Protection Standard (mg/L)
Arsenic	0.01	0.091	0.091
Boron	4(1)		
Cobalt	0.006	0.01	0.01
Lithium	0.04	0.01	0.04
Molybdenum	0.1	0.05	0.1

(1) IDEM health-based standard, not currently part of the CCR Rule

2.4 Groundwater and Porewater Geochemical Analysis

2.4.1 Estimation of Attenuation Rates

To evaluate the attenuation of arsenic, boron, cobalt, lithium, and molybdenum in groundwater at the Site and to assess the rate of attenuation, Golder applied the point decay method (USEPA 2011). The point decay method is used to determine the rate at which a constituent's concentrations are increasing or decreasing in groundwater at a single well between sampling events and this method can thus be used to predict when the constituent's concentrations will fall back below regulatory limits. Equation 1 describes first-order decay for a constituent:

$$Ln(C_t) = kt + Ln(C_0) \qquad \text{(Equation 1)}$$

where C_0 is the initial constituent concentration, C_t is the constituent concentration at time t, t is the amount of time in years that has passed since the initial concentration measurement, and k is the first-order decay rate constant (1 per year). Equation 2 shows Equation 1 reorganized to solve for the decay rate constant:

$$k = (Ln(C_t) - Ln(C_0))/t \qquad \text{(Equation 2)}$$

Groundwater water quality data from the background and downgradient wells collected between July 2016 and November 2019 were used to determine the mean first-order decay rate for each constituent of interest. Due to variable detection limits, results that were reported as below detection limits were not used in the point decay analysis. Using Equation 1 and the mean first-order decay rate, Golder calculated the number of years that it would take for constituents of interest concentrations greater than the GWPS to decrease below their respective thresholds.

2.4.2 Geochemical Speciation Modeling Methods

Golder conducted geochemical modeling to evaluate general groundwater and porewater composition, determine the potential for precipitation of sorbent media, evaluate the potential for mineral precipitation or adsorption in the aquifer, and determine the speciation of metals of interest. The geochemical computer code developed by the United States Geological Survey (USGS), PHREEQC (Parkhurst and Appelo 2013), was used for these simulations. PHREEQC version 3.4 is a general-purpose geochemical modeling code used to simulate reactions in water and between water and solid mineral phases (e.g., rocks and sediments). Reactions include aqueous equilibria, mineral dissolution and precipitation, ion exchange, surface complexation, solid solutions, gas-water equilibrium, and kinetic biogeochemical reactions. The widely-accepted thermodynamic database, Minteq.v4, 2017 edition, was used as a basis for the thermodynamic constants required for modeling (USEPA 1998b).

The Geochemist's Workbench version 12 (Bethke 2015) was used to generate graphical representations of geochemical modeling outputs in the form of predominance, or Pourbaix diagrams (also known as Eh-pH diagrams) for the species of interest (i.e. arsenic, boron, cobalt, lithium, and molybdenum) and trilinear plots (also known as Piper plots) displaying the relative abundance of major ions. The Minteq.v4 database was used as the basis for the Pourbaix diagrams.

2.4.3 Predictive Geochemical Modeling Methods

Golder performed geochemical modeling to assess viable attenuation mechanisms and to predict the quantity and stability of the attenuated constituents of concern.

2.4.3.1 Capacity of Adsorption as an Attenuation Mechanism

Adsorption is an important mechanism by which constituents in groundwater can be attenuated. The adsorptive partitioning between dissolved and solid phases was simulated using a two-layer surface complexation model (SCM). The SCM approach is described in Davis and Kent (1990), with additional parameterization based on Dzombak and Morel (1990) and Karamalidis and Dzombak (2011) utilizing iron (hydrous ferric oxide [Hfo]) as ferrihydrite [$Fe(OH)_{3(am)}$], and aluminum (hydrous aluminum oxide [Hao]) as gibbsite [$Al(OH)_{3(am)}$], as adsorbing surfaces.

The amount of Hfo and Hao available at the site for attenuation was based on the amorphous and metal hydroxide phase iron and aluminum concentrations measured in the SEP as described in Section 3.2.2. The minimum, mean, and maximum concentrations in soil borings were used in the adsorption models to capture the range of expected site concentrations. The Hfo and Hao surface properties (i.e., surface area, site density, and types of sites) from Dzombak and Morel (1990) and Karamalidis and Dzombak (2011) were used to quantify the iron and aluminum adsorption sites per mole of mineral.

The calculation methodology of Appelo and Postma (2010) was used to determine the specific quantity of sites on each mineral surface type as a function of the amount of mineral available to participate in these reactions. The methodology assumes the number of surface sites (sites) equals the product of the moles of iron ([Fe]) and the moles of surface sites per mole of iron ([sites]/[Fe]= 0.2 moles of sites per mole of iron). For the amount of ferrihydrite available for sorption, the Appelo and Postma methodology further assumes the mass of ferrihydrite (M_{HFO}) in grams (g) available equals the product of the [Fe] and the molecular weight of ferrihydrite (MW_{HFO} = 88.85 g/mole). The same approach was used to calculate the number of sites from gibbsite, assuming the [sites]/[Al] is 0.41 moles of sites per mole of aluminum and the molecular weight of gibbsite is 78.003 g/mole.

The geochemical thermodynamic database Minteq V.4 was used to conduct adsorption modeling. However, new and updated thermodynamic data have been released in scientific literature. These new data are important to include in the geochemical modeling exercises for certain elements or minerals as they allow further refinement of potential reactions, or for correction of previous data that may have been less accurate or more broadly defined. For groundwater modeling at the Site, Golder made numerous updates to the Minteq V.4 database, including the addition of data relating to partitioning coefficients for metals on gibbsite, developed by Karamalidis and Dzombak (2011). Of the five constituents of interest, the database did not contain partitioning coefficients for ferrihydrite or gibbsite for lithium, so its potential for adsorption could not be assessed.

To quantify current levels of adsorption, the concentration of constituents that adsorb in soils (as milligram (mg) of constituent/kilogram (kg) of soil) was modeled for the minimum, maximum, and mean Hfo and Hao contents when equilibrated with the range of groundwater qualities observed at the Site. To quantify the capacity of soil to adsorb additional amounts of each constituent, Golder simulated a step-wise increase in arsenic, boron, cobalt, and molybdenum concentrations (similar in concept to a titration, using the mean proportions observed in porewater) into the range of observed groundwater qualities while allowing equilibration with the sorption surfaces in soils (minimum, maximum and mean Hfo and Hao). The model was then used to predict the quantity of each constituent that would adsorb with this titration of additional arsenic, boron, cobalt, and molybdenum.

2.4.3.2 Mineral Precipitation and Co-precipitation

The potential for mineral precipitation was assessed in PHREEQC using a saturation index (SI) calculated according to Equation 3.

$$SI = \log (IAP/Ksp) \quad \text{(Equation 3)}$$

The saturation index is the ratio of the ion activity product (IAP) of a mineral to the solubility product (Ksp). An SI value greater than zero indicates that the solution is supersaturated with respect to a particular mineral phase and, therefore, precipitation of this mineral may occur. An evaluation of precipitation kinetics is then required to determine whether the supersaturated mineral will indeed form. An SI value less than zero indicates the solution is undersaturated with respect to a particular mineral phase. An SI value close to zero indicates equilibrium conditions exist between the mineral and the solution. SI values between -0.5 and 0.5 are considered to represent ‘equilibrium’ in this report to account for the uncertainties inherent in the analytical methods and geochemical modeling.

Co-precipitation was evaluated based on published literature and known association between minerals and constituents of concern. For example, cobalt is known to coprecipitate with iron oxyhydroxides as well as adsorb to Hfo (Norstrom and Alpers 1999). Therefore, to evaluate co-precipitation, minerals identified by PHREEQC to be at equilibrium (SI > -0.5) were evaluated for their potential to host arsenic, boron, cobalt, lithium, and molybdenum.

2.4.3.3 Capacity of Dilution and Dispersion as Attenuation Mechanisms

Dilution and dispersion are physical mechanisms of attenuation by which concentrations of constituents in groundwater decrease with migration along groundwater flowpaths.

To assess the potential for dilution and dispersion downgradient of the CCR Unit, Golder used MODPATH (Pollack 1989) and the calibrated Site Groundwater Flow model (discussed in Section 4.0 and Appendix B) to simulate travel times for particles released from the MCWB. The length of the particle traces produced by

MODPATH along with travel time estimates were used to calculate average groundwater velocities for the following flow paths: (see Figure 1):

- GAMW-16 to GAMW-53
- GAMW-18 to GAMW-55
- GAMW-17 to GAMW-54
- GAMW-09 to GAMW-54

The results of these flow path travel time simulations are presented in Table 4.

Golder estimated the capacity of dilution and dispersion to attenuate constituent concentrations from the CCR Unit using ratios of concentrations measured in monitoring wells along these flow paths, as presented in Table 8. For example, along the flow path from GAMW-16 to GAMW-53, concentrations of boron decreased from 9.7 milligram per liter (mg/L) to 3.1 mg/L, representing an estimated 68% decrease in concentration along the flow path due to dilution and attenuation.

2.4.3.4 Long Term Stability of Attenuated Constituents

Three sensitivity analyses were performed to assess the stability of adsorbed constituents under variable pH, redox, and ionic strength conditions. Variations in pH, redox, and ionic strength are the most likely types of changes that will occur in an aquifer over time affecting the stability of the constituents of interest (ITRC 2010). The sensitivity analyses were conducted applying the minimum, mean, and maximum Hfo and Hao contents determined for the Site soils, equilibrated with the groundwater qualities observed at the Site at the measured pH and redox conditions. For each sensitivity analysis, a single parameter was varied:

- **pH -** Hydrochloric acid or sodium hydroxide addition was modeled to vary the pH between 4 and 12 standard units (SU). A pH range of 4 to 10 is the typical range considered for evaluating metal speciation.
- **Redox -** DO addition was simulated to adjust reduction potential (Eh) values between -200 and +700 millivolts (mV) based on the historical and anticipated range of Eh in the region.
- **Ionic Strength -** Total dissolved solids (TDS) concentrations were increased by titrating in calcium, magnesium, sodium, potassium, chloride, and sulfate in the proportions observed in porewater. TDS concentrations were evaluated up to 10,000 mg/L, which is approximately four times higher than the highest TDS concentration observed in groundwater at the CCR Unit.

2.4.4 Geochemical Modeling Assumptions and Data Handling

Geochemical modeling assumptions and data handling included the following:

- **Groundwater continuity:** Three or four groundwater quality samples were collected from each well during sampling events conducted between September 2018 and November 2019. Samples from this period were selected for the geochemical modeling because all wells related to the CCR Unit were sampled and analyzed for the full suite of parameters described in Section 2.1.2 and the resulting data are assumed to provide a comprehensive overview of groundwater conditions. Temporal trend analysis for arsenic, boron, cobalt, lithium, and molybdenum made use of all available sampling events between July 2016 and November 2019.

- **Porewater chemistry:** Porewater samples collected from GAPIEZ-06 (three samples total in August, September, and October 2018), DAPZ-02A (one sample collected in March 2020), and DAPZ-02B (one sample collected in March 2020) were assumed to be representative of porewater found in the CCR Unit. Data from three sampling events from GAPIEZ-06 were used to evaluate porewater trends.
- **Redox values:** ORP values measured in the field were converted to Eh by adding 200 mV to the field-measured values as per YSI Tech Note (YSI 2015).
- **Non-detect values:** Constituents with concentrations less than their respective method reporting limits were assumed to have a concentration equal to half the reporting limit in model simulations.
- **Total recoverable concentrations:** Total recoverable fraction results were used for geochemical modeling.
- **Charge balance:** Groundwater and porewater compositions with charge balance errors less than 10% were considered valid. Compositions with charge balance errors greater than 10% were flagged as potentially less reliable, but still included in the geochemical modeling effort.

3.0 SUPPLEMENTAL ASSESSMENT RESULTS

3.1 Groundwater and Porewater

3.1.1 Groundwater Characterization

Groundwater quality data for background, downgradient, and Assessment Monitoring wells used for this evaluation were collected from September 2016 to November 2019. Non-regulated (per the CCR Rule) groundwater parameters (e.g., alkalinity, potassium, sodium) are only available from September 2018 to November 2019. The assessment of trends in arsenic, boron, cobalt, lithium, and molybdenum concentrations in groundwater included observations of all validated data collected during that time frame. Groundwater quality monitoring data are presented in Appendix A and can be summarized as follows:

- **Charge balance error:** Charge balance errors could only be assessed for samples for which the full suite of cations and anions was reported. Eleven groundwater samples had charge balance errors greater than 10%. Eight out of the eleven samples (GAMW-07 in November 2019, GAMW-07B in November 2019, GAMW-08B October 2018, GAMW-08B in November 2019, GAMW-18 in October 2018, GAMW-18B in October 2018, GAMW-18B in November 2019 and GAMW-56B in April 2019) reported charge balance errors between 10% and 15%. Only samples from GAMW-07B in September 2018, GAMW-18B in April 2019, and GAMW-56 in April 2019 had a charge balance error greater than 40%. All eleven results were flagged (Table 5) and retained, with the understanding that they may be somewhat less reliable. Upon subsequent sampling, charges balance errors decreased to <10 % in these wells.
- **pH:** Groundwater pH across background, downgradient, and Assessment Monitoring wells ranged from 5.2 to 8.7. The geometric mean pH across all wells was 7.2. GAMW-07B, GAMW-52B, GAMW-54B were the only wells that produced samples with a pH exceeding 8.0.
- **ORP (Redox):** Field-measured redox, corrected to Eh (+200 millivolts [mV]) values, ranged from -115 to +335 mV in the background monitoring well, downgradient monitoring well, Assessment Monitoring well, and porewater samples collected between September 2018 to November 2019. There was no apparent trend in redox conditions based on sample location or depth.

- **Total Dissolved Solids:** Groundwater TDS concentrations were variable. Generally, the lowest TDS concentrations (less than 400 mg/L) were measured in groundwater at Assessment Monitoring wells (GAMW-46, GAMW-46B, GAMW-52, GAMW-53) while TDS concentrations up to an order of magnitude higher were determined in groundwater at wells located immediately downgradient of the CCR Unit (e.g., GAMW-08B). In general, deep wells demonstrated higher TDS concentrations than shallower companion wells at the same locations.

- **Major ion chemistry:** A Piper plot was generated for all porewater samples and groundwater samples from background, downgradient, and Assessment Monitoring wells to facilitate the identification of water types and changes in major ion chemistry over time (Figure 2a-c). The majority of background, downgradient, and porewater samples are calcium-sulfate dominated. In general, deep wells have a higher proportion of sodium and sulfate than the shallower companion wells. The differences between shallow and deep companion wells are more pronounced in the Assessment Monitoring wells. Except for GAMW-54 and GAMW-55, the shallow samples from the assessment wells are calcium-(bi)carbonate dominated and plot in a different location on the Piper plot than background, downgradient, and porewater samples. Shallow wells GAMW-54 and GAMW-55, along with all the deep Assessment Monitoring wells, are calcium-sulfate dominated and plot with background, downgradient, and porewater samples. The water types have remained generally unchanged between September 2018 and November 2019. Generally, this indicates that groundwater types are consistent. However, based on major ion chemistry, there are different water types on the site that are likely influenced by variable site geology.

- **Arsenic:** Arsenic concentrations in groundwater samples collected from downgradient monitoring and Assessment Monitoring wells between September 2016 to November 2019 ranged from non-detect (<0.005 mg/L) to 0.022 mg/L (Figure 4a-c). The highest measured arsenic concentration in groundwater at the CCR Unit (0.091 mg/L) was reported in a sample collected from background well GAMW-15 in September 2018 (Figure 4a). No downgradient monitoring well has ever exceeded the GWPS of 0.091 mg/L designated for the CCR Unit. Arsenic concentrations in groundwater appear to be stable or decreasing in all downgradient monitoring wells (Figure 4b). Arsenic concentrations in the CCR Unit porewater (GAPIEZ-06) ranged from 0.011 to 0.012 mg/L in August and October 2018 (Appendix A-2). Arsenic concentrations collected from the Drying Area in March 2020 (DAPZ-02A and DAPZ-02B) were an order of magnitude lower (<0.0010 and 0.0018 mg/L, respectively). Based on the observed pH and Eh conditions, arsenic predominately occurs as an oxidized arsenate (As^{+5}) species, with arsenic in only a small number of samples present as a reduced arsenite (As^{+3}) species (Figure 3a). Arsenite is less readily adsorbed than arsenate and is thus generally regarded to be more mobile in natural environments (Nordstrom 2014).

- **Boron:** Boron concentrations in downgradient groundwater samples collected between September 2016 to November 2019 ranged from 0.056 mg/L to 25 mg/L (Figure 5a-c). The highest boron concentration (25 mg/L) was measured in monitoring well GAMW-09B in September 2017. Two background wells (GAMW-07B and GAMW-15B), seven downgradient wells (GAMW-08B, GAMW-09, GAMW-09B, GAMW-16B, GAMW-17, GAMW-17B, and GAMW-18B) and two Assessment Monitoring wells (GAMW-54B and GAMW-55B) reported boron concentrations greater than the health-based standards (4 mg/L). Boron concentrations in porewater were between 7.4 mg/L and 13.8 mg/L. Based on pH conditions on the Site, boron in all wells occurs predominately in the form of protonated boric acid (H_3BO_3) (Figure 3b). Generally, boron concentrations in the background and downgradient wells have remained stable or has decreased. This is also the case for all assessment and boundary well except for GAMW-55B, where boron has increased slightly. GAMW-55B is a deep well and heavily influenced by bedrock.

- **Cobalt:** Cobalt concentrations ranged from non-detect (<0.001 mg/L) to 0.059 mg/L in groundwater samples collected between September 2016 to November 2019 at the CCR Unit (Figure 6a-c). GAMW-08 had the highest cobalt concentration of all monitoring wells (0.059 mg/L in November 2016) and generally reported a decreasing trend thereafter (Figure 6b). The second highest concentration (0.010 mg/L in June 2017 and October 2018) occurred in GAMW-07, a background well (Figure 6a). GAMW-08 is the only well on Site to have reported a historic cobalt level greater than the GWPS (0.010 mg/L). Cobalt in porewater ranged from below the laboratory reporting limit (<0.0010 mg/L) to 0.0022 mg/L. Cobalt in all wells occurs predominately as the divalent cation Co^{+2}, based on pH and Eh conditions (Figure 3c). Cobalt concentrations appear to be stable or decreasing in groundwater samples collected from the upgradient, downgradient, and Assessment Monitoring wells.
- **Lithium:** Lithium concentrations in groundwater ranged from non-detect (<0.008 mg/L) to 0.025 mg/L between September 2016 to November 2019 (Figure 7a-c). Two downgradient wells, GAMW-18B and GAMW-08, located directly downgradient of the MCWB, have historically had the highest lithium concentrations (Figure 7b). Lithium concentrations historically have not exceeded 0.040 mg/L, the health-based standard. Lithium levels in GAMW-08 appear generally consistent over time, and a trend cannot be determined for GAMW-18B, as the well was recently installed and fewer than four sampling events have been conducted. Lithium concentrations in groundwater at all other wells downgradient of the CCR Unit appear to be stable. Lithium was not detected above the laboratory reporting limit (0.008 mg/L) in the CCR Unit porewater (GAPIEZ-06). Lithium concentrations collected from the Drying Area in March 2020 (DAPZ-02A and DAPZ-02B) were <0.008 mg/L and 0.016 mg/L, respectively. Lithium predominately occurs as the monovalent cationic species Li^{+} based on field pH and Eh conditions (Figure 3d).
- **Molybdenum:** Molybdenum concentrations in groundwater ranged from non-detect (<0.010 mg/L) to 0.18 mg/L (Figure 8a-c). Although GAMW-18 has reported historical levels of up to 0.18 mg/L, concentrations have been below 0.1 mg/L (the health-based standard) since August 2017. No other CCR Unit monitoring wells have reported concentrations exceeding 0.1 mg/L. The molybdenum concentration in porewater has ranged from 0.063 mg/L to 0.81 mg/L. Molybdenum is predominately present in the form of the divalent anionic molybdate (MoO_4^{-2}) species based on field-measured pH and Eh conditions (Figure 3e).
- **Iron:** Total (un-filtered) iron concentrations were variable, ranging from non-detect (<0.1 mg/L) to 13 mg/L between September 2018 and November 2019 (Appendix A-1). The highest concentration of 13 mg/L was observed in the groundwater sample collected from Assessment Monitoring well GAMW-56. No geographical trend is apparent; however, deeper “B wells” generally tended to have higher total iron contents. Ferric iron (Fe^{+3}) concentrations were higher than ferrous iron (Fe^{+2}) concentrations in all samples, except for those collected from wells GAMW-15, GAMW-55B, and GAMW-56.
- **Nutrients:** Total nitrogen (nitrate + nitrite) was measured in groundwater samples collected in October 2018 and was present at low levels (i.e. less than 2.8 mg/L). Nitrate concentrations were measured in samples collected in 2019 and concentrations ranged from below the detection limit (<0.05 mg/L) to 7.7 mg/L. The highest reported nitrate concentration was found in GAMW-08 in May 2019 (7.7 mg/L-N). The presence of low-level nitrate confirms oxidized conditions surround the CCR Unit. Phosphate concentrations exceeding 1 mg/L were detected in groundwater samples from GAMW-15 and GAMW-16. Phosphate concentrations were below detection in groundwater samples collected from 18 of the 25 wells between September 2018 and November 2019. No geographical or temporal trend is apparent in the phosphate concentrations related to the CCR Unit (Appendix A).

The monitoring data also indicate that sulfate generally occurs at the highest concentrations immediately downgradient of the CCR Unit and in background monitoring wells (Figure 9a-c). As identified in Figure 2a-c, considering major groundwater chemistry and sulfate, the CCR Unit is likely influencing groundwater quality in Assessment Monitoring wells GAMW-54/54B and GAMW-55/55B. However, while affected by the CCR Unit, these wells report low concentrations of arsenic, cobalt, lithium, and molybdenum below health-based standards or below detection limits. Boron concentrations were elevated above its GWPS in both upgradient and downgradient wells, suggesting elevated concentrations are naturally occurring or due to an alternate source at the Site.

3.1.2 Evaluation of Attenuation Rates

The results of the point decay analysis for groundwater at background and downgradient wells (including Assessment Monitoring wells) between September 2016 and November 2019 are provided in Table 6, as mean site attenuation rates. This evaluation reveals that, despite concentrations generally increasing in background wells over time (as indicated by positive point decay constants), boron, cobalt, lithium, and molybdenum concentrations in downgradient wells have decreased (negative point decay constants) over that same monitoring period. The mean downgradient decay rates can be used to estimate the number of years it would take for elevated groundwater concentrations to decrease to the GWPS. Maximum concentrations of boron, cobalt and molybdenum observed in downgradient monitoring wells over the period of monitoring would take approximately 41 years, 39 years, and 20 years, respectively, to attenuate to concentrations below GWPS (or health-based standard for boron) based on these decay rates. The durations required to achieve regulatory standards for arsenic and lithium were not calculated because there are no exceedances of the GWPS for these constituents.

The positive mean point decay rate for arsenic in downgradient monitoring wells indicates that, on average, concentrations are increasing. Given the low concentrations in the porewater samples (≤ 0.012 mg/L), this trend is unlikely to be caused by the CCR Unit. Low-level increasing arsenic concentrations in Assessment Monitoring wells GAMW-52B, GAMW-53B, GAMW-54, and GAMW-54B are driving the positive point decay rate, but the arsenic concentrations in these wells remain sufficiently low (≤ 0.005 mg/L) and are likely caused by natural variability. Although an increasing trend of arsenic at these wells currently may exist, it is unlikely this trend will continue given the potential for attenuation (e.g., through sorption and dilution) to maintain arsenic concentrations below the GWPS.

3.1.3 Mineralogical Controls in Groundwater and Porewater

The results of speciation modeling of groundwater data from background, downgradient, and Assessment Monitoring wells between September 2018 and November 2019 are provided in Table 5, including saturation indices for relevant minerals. Mineral saturation can play an important role in attenuation of metals, either directly by their removal through mineral precipitation, or indirectly by providing sorptive surfaces or opportunities for co-precipitation.

- **Iron-bearing minerals:** Ferrihydrite was indicated to be at equilibrium with groundwater or oversaturated in nearly all samples, indicating a strong potential for ongoing precipitation of solid-phase iron oxides. Only two samples from Assessment Monitoring well GAMW-53 (April 2019 and November 2019) were modeled to be undersaturated with respect to ferrihydrite. Thus, it is assumed that iron (hydr)oxides are prevalent in the Site aquifers.
- **Other minerals:** Nearly all groundwater samples, with the exception of samples from GAMW-07 and GAMW-52, were simulated to be in equilibrium or oversaturated with respect to barite ($BaSO_4$). Fluorite

(CaF_2) equilibrium was indicated in wells GAMW-07B, GAMW-08/08B, GAMW-17, and GAMW-52B. Gypsum ($CaSO_4.2H_2O$) was modeled to be in equilibrium in seven wells (GAMW-07B, GAMW-08B, GAMW-15B, GAMW-16B, GAMW-18, GAMW-18B, and GAMW-55B), most of which were deeper "B-wells" nearer to bedrock. Calcite ($CaCO_3$) equilibrium was indicated in all wells except GAMW-53.

In summary, several mineral phases likely control groundwater composition at some or all wells: barite, calcite, fluorite, ferrihydrite, and gypsum. In the case of ferrihydrite, the dissolved concentrations of constituents of interest can be reduced through its ability to act as a substrate for adsorption.

3.2 Overburden Soil

3.2.1 Mineralogical Composition

Quantitative XRD with Rietveld refinement was used to identify and quantify minerals in five overburden soil samples collected during the drilling activities (Table 7). Three of the samples were collected from the Assessment Monitoring well's soil borings and two samples were collected from the downgradient soil boring (OW-9). These samples were obtained to better understand the mineralogical composition of the aquifer system and identify any minerals that would potentially influence attenuation of constituents of interest. In addition, and in contrast, the presence of certain minerals could also indicate a potential for naturally occurring release of metals into groundwater, for instance due to oxidation of sulfide minerals.

The mineralogical analysis identified the iron sulfide minerals pyrite and marcasite at low levels in three of the five overburden soil samples, at concentrations up to 0.6 wt.%. These minerals can oxidize in the presence of even trace amounts of dissolved oxygen, which would lead to the liberation of trace metals or metalloids known to associate with sulfide minerals (e.g., arsenic, cobalt, and molybdenum) into groundwater (Smith and Huyck 1997). In addition, the associated release of iron creates the potential for formation of minerals with the ability to sorb trace elements.

The presence of the oxidized iron mineral hematite (Fe_2O_3) at 0.3 to 0.6 wt.% in three of the five overburden soil samples in the presence of reduced iron sulfide minerals indicates a spectrum of oxidation occurring in overburden soil samples. As pyrite or marcasite is oxidized, intermediate amorphous iron phases, such as ferrihydrite, would likely occur first. Over time, crystallization would progress, forming iron oxide-oxyhydroxides such as hematite or goethite (FeOOH). Therefore, it is likely a range of iron solid phases is present in the overburden soil, and the potential exists over time for an increased presence of amorphous and crystallized iron oxides-oxyhydroxides with a strong affinity to attenuate certain metals and metalloids (Dzombak and Morel 1990).

The mineralogical analysis also identified the carbonate minerals calcite ($CaCO_3$) and dolomite ($CaMg(CO_3)_2$) in all overburden soil samples, with combined concentrations between 9 and 16 wt.%. Carbonate minerals are known to adsorb cobalt (Brady et al. 2003) while sorption and uptake of arsenic are possible as well (e.g., Romero et al. 2004). Carbonate minerals can dissolve when exposed to sulfuric acid formed by oxidation of sulfide minerals and release associated trace metals and metalloids (Section 3.2.2) into groundwater. Iron can also be released as carbonate minerals dissolve and potentially form metal hydroxide minerals.

3.2.2 Chemical Composition and Sequential Extraction

Chemical analysis and sequential extraction were conducted to determine the chemical composition and the distribution of constituents of interest over various operationally defined fractions of the overburden soil. This testing was completed per Table 2 on nine overburden soil samples from eight monitoring well locations, two samples from the OW-9 borehole, and one sample from within the Drying Area (reported in Table 8). Soil samples

from soil borings that correspond to well locations were collected from within the screened depth (except SB-53B 25'-27' which was collected above the screened depth).

A description of the individual fractions determined by sequential extraction is presented in Section 2.2.2, footnote 1. Metals extracted in steps 1 through 5 are considered environmentally available, whereas metals extracted in steps 6 and 7 are present in refractory fractions and are not expected to be released under conditions typically encountered in aquifers (Tessier et al. 1979). The sum of metal concentrations from the sequential extraction steps is expressed as "SEP SUM" in Table 8 and does not represent an analytically determined value. The concentration measured by total metals analysis is referred to as "SEP Total" in Table 8. Boron was not included in the SEP analysis due to method limitations.

The results from the chemical analysis and sequential extraction can be summarized as follows:

- **Iron:** Iron was present in all twelve samples analyzed, varying from 3,400 milligram per kilogram (mg/kg) (DA-14) to 9,900 mg/kg (SB-54B). In all samples, the refractory sulfide and residual fractions accounted for the largest proportion of total iron and, as such, most of the iron is not environmentally available (Figure 10). The labile fraction in steps 1 through 5 can generally be considered representative of the amount of iron in the overburden that may be available as a sorbing medium. While not a constituent of interest, iron and its minerals commonly represent the most important reservoir for metal/metalloid attenuation in soils or overburden. The labile fraction calculated from sequential extraction, therefore, can be used as a proxy for determining the total number of adsorption sites available for attenuation of arsenic, boron, cobalt, and molybdenum in the environment.
- **Arsenic:** Total arsenic in the soil overburden samples ranged from 1.9 to 6.2 mg/kg while the environmentally-available fraction ranged from 0.44 mg/kg in SB-55B to 3.0 mg/kg in SB-53B, representing from 31% to 59% of total arsenic (Figure 11). The majority of arsenic was present in the refractory fraction, predominantly associated with sulfide minerals. The amorphous metal and metal hydroxide fractions hosted all arsenic that was environmentally available except in SB-52B, where the carbonate fraction represented 8.5% of total arsenic. The highest concentrations of environmentally-available arsenic occurred in sample SB-56B, and the lowest concentrations were encountered in samples DA-14, SB-53B and SB-55B. The Drying Area sample (DA-14) had the second lowest environmentally-available arsenic concentrations (0.45 mg/kg) of all samples analyzed. Arsenic in DA-14 predominantly occurred in the sulfide and insoluble fractions.
- **Cobalt:** Total cobalt in soil borings ranged from 2.5 mg/kg to 6.1 mg/kg while the environmentally-available fraction ranged from 1.1 mg/kg in OW-9 to 2.9 mg/kg in SB-53B, representing from 27% to 60% of total cobalt (Figure 12). Those samples downgradient of the CCR Unit had similar total cobalt in the environmentally-available fraction as the background samples. In all boring samples, cobalt was most abundant in the metal hydroxide, sulfide, and residual fractions. Cobalt was also present in the carbonate phase in the nine soil bore samples (5% to 14% of total). Cobalt in the carbonate phase is most likely sorbed onto or coprecipitated with the calcite that was indicated to be in equilibrium with groundwater in geochemical modeling. Cobalt was not detected in the exchangeable phase. DA-14 reported the lowest total and environmentally-available cobalt concentrations (0.87 mg/L and 0.39 mg/L, respectively) of all samples analyzed, predominantly in the metal hydroxide and sulfide fractions.
- **Lithium:** Total lithium ranged from 4.2 to 11 mg/kg while the environmentally-available fraction ranged from 0.5 mg/kg in DA-14 to 11.4 mg/kg in SB-18B, representing from 12% to 74% of total lithium (Figure 13). The

majority of lithium was present in either the organic or the refractory fraction. The organic, carbonate, and metal hydroxide fractions hosted all lithium that was environmentally available. The highest concentrations of environmentally-available lithium occurred in samples SB-18B, SB-54B, SB-55B and SB-56B, and the lowest amount was encountered in SB-53B. Lithium concentrations in DA-14 were generally lower than in background and downgradient monitoring wells, with the majority of the lithium present in the sulfide and residual fractions.

- **Molybdenum:** Total molybdenum in overburden ranged from 0.15 to 3.8 mg/kg while the environmentally-available fraction ranged from non-detect to 2.83 mg/kg, in SB-53B (25'-27'), and accounted for 100% of all molybdenum in SB-18B and SB-53B (30'-32') (Figure 14). Molybdenum was most commonly present in the amorphous and metal hydroxide fractions. Notably, in background boring SB-07B and in SB-08B, a downgradient boring in close proximity of the CCR Unit, molybdenum was non-detect in overburden soil samples. The soil boring with the highest total molybdenum content, SB-53B, is located further downgradient from the CCR Unit. The Drying Area sample (DA-14) had the highest concentrations (15 mg/kg) of all samples analyzed. Molybdenum in DA-14 was present predominantly in the exchangeable fraction.

In summary, no definitive trends were present for arsenic, cobalt, lithium or molybdenum that indicated a higher concentration immediately downgradient of the CCR Unit relative to background locations or locations further downgradient. Based on the above results, attenuation by adsorption of all four constituents of interest is likely occurring, with the carbonates, amorphous metal oxides, and metal hydroxide fractions accounting for the majority of the attenuation.

4.0 GROUNDWATER MODELING RESULTS

Through standard numerical groundwater modeling procedures, Golder developed a steady state groundwater flow model for the Site that is considered calibrated and verified. Details of the flow model development are presented in Appendix B. This model was utilized to inform the natural attenuation study by simulating travel times for particles released from the MCWB, as presented in Table 4.

5.0 GEOCHEMICAL MODELING RESULTS

5.1 Identification and Capacity of Attenuation Mechanisms

5.1.1 Adsorption to Iron and Aluminum Oxyhydroxides

The Hfo and Hao surface area and sorption site calculations for the minimum, mean, and maximum soil boring iron and aluminum concentrations are presented in Table 10. Adsorption modeling in PHREEQC revealed a large range of adsorption capacities expected for the different constituents at the site. Figure 15 displays the predicted trajectories of aqueous concentrations before and after adsorption onto Hfo and Hao in soils (minimum, mean and maximum Hfo and Hao), as additional arsenic, boron, cobalt, and molybdenum are titrated into solution. The bold lines display the geometric means for all groundwater scenarios within each soil scenario and the grey area represents the range for the 5th to 95th percentile of all soil scenarios. As mentioned in Section 2.4.3.1.2, lithium adsorption to iron and aluminum oxyhydroxides was not modeled due to a lack of available thermodynamic data.

The predicted trajectories are compared against the GWPS and porewater concentrations. On the plots, the further the predicted trajectories are to the right of the 1:1 line, the larger the amount of the constituent that has sorbed to Hfo and Hao surface sites in soils and is no longer predicted to reside in the aqueous phase. For boron, little to no adsorption is predicted by the model, so aqueous concentration before adsorption are almost identical to concentrations after adsorption. For arsenic, a large proportion is expected to adsorb, with a capacity to bring

average arsenic concentrations to below 0.01 mg/L when concentrations are at approximately 10 mg/L or lower prior to adsorption. At higher arsenic concentrations (> 10 mg/L), the relative sorption capacity is diminished as sorption sites are filled and aqueous concentrations after adsorption are predicted to increase above its GWPS. For cobalt and molybdenum, the trajectories run parallel to the 1:1 line, indicating that sorption capacity is directly proportional to the concentration before adsorption. The modeling results suggest that adsorption has the capacity to reduce cobalt concentrations below approximately 0.1 mg/L down to the GWPS of 0.01 mg/L and molybdenum concentrations below approximately 0.2 mg/L down to the GWPS of 0.1 mg/L. The 95th percentile of modeled trajectories show that a minority of pH and redox conditions at site were less favorable for attenuating cobalt or molybdenum, as seen by the proximity to the 1:1 line.

5.1.2 Co-precipitation

In addition to adsorption, co-precipitation or the direct incorporation of trace metals such as cobalt into precipitated iron oxide-oxyhydroxides has been well studied in literature (Butt et al. 2000; Dzombak and Morel 1990; Smith 1999). For the soils analyzed by sequential extraction (Section 3.2.2), all samples had higher concentrations of cobalt in the amorphous and metal hydroxide phases than indicated by adsorption modeling. This suggests that cobalt concentrations also may be attenuated during the formation of ferrihydrite (Butt et al. 2000; Tebo et al. 2004). Cobalt was also identified by SEP to be associated with carbonate minerals, likely due to co-precipitation with the dolomite or calcite identified by mineralogical analysis. Arsenic co-precipitation with amorphous phases of iron and other metal oxyhydroxides is also considered possible. However, per the SEP results, no arsenic was found to be associated with carbonate minerals. Co-precipitation is either not likely or relevant for boron, lithium, and molybdenum.

5.1.3 Physical Attenuation

Table 9 presents the predicted concentrations at Assessment Monitoring wells, assuming the minimum and maximum amount of dilution and dispersion downgradient of the CCR Unit (Section 4.0). The highest concentrations of arsenic, boron, cobalt, lithium, and molybdenum measured in porewater were “diluted” in the geochemical simulations with the maximum concentrations observed in side-gradient wells GAMW-52, GAMW-52B, GAMW-56, and GAMW-56B to provide a conservative estimate of dilution and dispersion.

For arsenic, cobalt, and lithium, the maximum concentrations in porewater were below the GWPS. Dilution and dispersion with groundwater from side-gradient wells generally resulted in a further decrease below the GWPS. At GAMW-56, arsenic and cobalt concentrations were elevated over those in porewater. Consequently, dilution/dispersion of porewater with water from GAMW-56 resulted in higher concentrations relative to porewater, though still below GWPS.

For boron the maximum porewater concentrations were elevated above the health-based standard (345%) and for molybdenum, the maximum porewater concentrations were elevated above the GWPS (810%). The 32 to 63 percent reduction in concentrations by dilution and dispersion alone was not sufficient to bring the maximum porewater concentrations below the relevant standards. For boron, concentrations in background monitoring well GAMW-15 were twice as high as those in porewater. Due to this background source, boron concentrations in side-gradient wells are also relatively high and limit the effectiveness of dilution to reduce boron concentrations downgradient of the CCR Unit. For molybdenum, concentrations in monitoring wells have been below GWPS since March 2018, indicating additional dilution/dispersion or other attenuating processes have reduced porewater concentrations between the CCR Unit and the monitoring wells. As a consequence, molybdenum concentrations will likely remain below the GWPS.

5.2 Long-Term Stability of Attenuated Constituents

The expected variations in dissolved concentration as a function of pH, Eh, and TDS are presented in Figures 16, 17, and 18, respectively. Results are presented along with GWPS values and the range of pH, Eh, or TDS values (5th percentile to 95th percentile) observed at the Site. Responses to changes in pH, Eh, and TDS vary widely by constituent. The results of the adsorption stability modeling for arsenic, boron, cobalt, and molybdenum can be summarized as follows:

- **Arsenic:** For the range of pH values observed at the site, greater than 95% of the arsenic is expected to sorb to Hfo and Hao (Figure 16a). At pH values below 6.0, a conversion of arsenate to arsenite is modeled to release the adsorbed arsenic into groundwater. For alkaline pH values between 8.0 and 10.0, there is a small amount of additional capacity for arsenic to adsorb. At extremely alkaline conditions (pH greater than 10.0), higher proportions of negatively-charged sorption sites on Hfo and Hao limit the effectiveness of sorption of anionic species, resulting in higher amounts of desorbed arsenic. Under reducing conditions (Eh less than -100 mV), arsenic is largely present as arsenite and sorption is limited (Figure 17a). Over intermediate redox conditions (Eh between 0 and 500 mV), adsorbed arsenic is relatively stable. Above 500 mV, arsenic is expected to desorb again. Under increasing TDS concentrations (Figure 18a), arsenic sorption declines as other anions compete with and replace arsenic from sorption surfaces. For arsenic, TDS concentrations at the Site could quadruple relative to observed values before aqueous concentrations increase above the GWPS.
- **Boron:** Based on the relatively small proportion of boron that can be adsorbed to Hfo and Hao surface sites, changes in pH, Eh, and TDS concentrations are modeled to have only a minor impact on aqueous concentrations, as evidenced by the horizontal trends in Figures 16b, 17b, and 18b.
- **Cobalt:** The pH response of cobalt (Figure 16c) is broadly similar to that of arsenic, with cobalt being nearly completely in dissolved form under acidic conditions but generally sorbed under alkaline conditions. Cobalt was generally modeled to be unresponsive to changes in redox conditions (Figure 17c), with little additional cobalt sorbing or desorbing over the range of tested Eh conditions. Cobalt was also not responsive to increases in TDS concentrations (Figure 18c), with sorption remaining relatively unchanged as TDS concentrations increased 4- to 40-fold above the commonly-observed range at the Site.
- **Molybdenum:** For molybdenum, lower pH values (more acidic conditions) were generally more favorable for adsorption (Figure 16d). At alkaline pH values (pH greater than 10), nearly all molybdenum is desorbed and present in the dissolved phase. Over the range of common Eh values at site (Figure 17d), molybdenum sorption is relatively stable. Highly reducing conditions are predicted to increase molybdenum adsorption and highly oxidizing conditions are predicted to reduce adsorption. Molybdenum adsorption is generally insensitive to increases in TDS concentrations (Figure 18d), with TDS concentrations up to 10,000 mg/L less than doubling the aqueous concentrations due to desorption.

6.0 TIER I EVALUATION

The potential for natural attenuation of arsenic, boron, cobalt, lithium, and molybdenum was evaluated in accordance with recommended practices and guidance promulgated by the USEPA and the ITRC (USEPA 2007a; USEPA 2007b; ITRC 2010). According to USEPA (USEPA 2007a), the purpose of the Tier 1 evaluation is to “Demonstrate that the groundwater plume is not expanding and that sorption of the contaminant onto aquifer solids is occurring where immobilization is the predominant attenuation process.” Based on this definition, the following observations support MNA as a viable corrective measure for the CCR Unit:

- **Plume Stability:** Based on the water quality monitoring data presented in this Assessment Monitoring, groundwater concentrations of arsenic, boron, cobalt, lithium, and molybdenum outside of the CCR Unit appear to be stable or decreasing. Evaluation of trend charts generally did not reveal increasing trends in wells downgradient of the CCR Unit (Figures 4 to 8), including for parameters such as boron and sulfate, which are considered common indicators of CCR leaching (Figures 5 and 10). These observations indicate that the distribution of arsenic, boron, cobalt, lithium, and molybdenum in the aquifer is stable.
- **Magnitude of Exceedances:** Arsenic has remained below the CCR Unit GWPS (0.091 mg/L) in all downgradient monitoring wells. Boron concentrations exceed the health-based standard (4 mg/L) in nine of the downgradient (Downgradient Monitoring and Assessment Monitoring) wells, but concentrations are generally within the range of background monitoring well concentrations, suggesting naturally-elevated levels or an alternative source of boron causing the concentrations in groundwater at the Site. The cobalt concentration in groundwater at GAMW-08, the only downgradient monitoring well exceeding the GWPS, has shown a decreasing trend since 2016. The most recent concentration of cobalt (0.011 mg/L in November 2019) was just 0.001 mg/L above the GWPS of 0.010 mg/L. No wells exceed the health-based lithium standard (0.04 mg/L). Molybdenum concentrations in all wells have been consistently below the health-based standard of 0.1 mg/L since August 2017, indicating a low likelihood of a future exceedances based on historical trends.
- **CCR Unit Porewater:** The CCR Unit at RMSGS was placed into service in 1976 and historical records are not available for ash additions or porewater concentrations over the CCR Unit's lifespan. However, based on recent porewater data, the arsenic concentration in the CCR Unit (0.011 mg/L to 0.018 mg/L) is well below the GWPS of 0.091 mg/L. Cobalt and lithium concentrations in porewater in the CCR Unit were low and only detected above their laboratory reporting limit in a single sample (0.0022 mg/L and 0.016 mg/L, respectively). This indicates that the CCR Unit is not a potential source for these metals. Boron concentrations in the porewater (8.3 mg/L to 13.8 mg/L) are elevated above the health-based standard of 4 mg/L but are below levels observed in the two deep background monitoring wells GAMW-07B (15-23 mg/L) and GAMW-15B (13-18 mg/L). Molybdenum in the CCR Unit was measured at concentrations up to 0.81 mg/L, above its GWPS. Even so, molybdenum concentrations in groundwater downgradient of the CCR Unit are currently below the GWPS.
- **Groundwater Chemistry:** The groundwater monitoring results and the findings of the geochemical modeling support the potential for natural attenuation of arsenic, boron, cobalt, lithium, and molybdenum. Equilibrium of groundwater with the mineral phase ferrihydrite was modeled to occur in all groundwater samples and calcite equilibrium was indicated in all downgradient monitoring wells except GAMW-53. This is consistent with the results from the sequential extraction analysis that indicate carbonate, amorphous, and metal hydroxide fractions sequester arsenic, boron, cobalt, lithium, and molybdenum.
- **Confirmation of Attenuation/Immobilization:** Based on both mineralogical and chemical analysis, it is evident that attenuation of arsenic, cobalt, lithium, and molybdenum by aquifer materials is occurring. Iron, capable of forming (hydr)oxide phases that facilitate metals attenuation (Dzombak and Morel 1990), was identified in all overburden samples. Mineralogical analysis confirmed iron was present as an oxide phase in the form of hematite in all overburden samples. Arsenic, cobalt, lithium, and molybdenum demonstrated a high degree of immobilization due to attenuation on carbonate, amorphous, and metal hydroxide fractions. This indicates that these phases have been and are scavenging or attenuating constituents that were once present in solution. Groundwater samples from Assessment Monitoring wells GAMW-53/53B, GAMW-

54/54B, GAMW-55/55B, and GAMW-56/56B report a similar major ion signature as groundwater in monitoring wells proximal to the CCR Unit. However, no arsenic, cobalt, lithium, or molybdenum has been detected in these wells above background levels. In addition, soil borings from these wells contained significant proportions of constituents attenuated in various phases, especially in the case of lithium. As a result, the groundwater concentrations of these constituents are maintained at low levels, demonstrating attenuation.

Based on these findings, arsenic, boron, cobalt, lithium, and molybdenum were considered candidates for an MNA remedy application and were deemed to meet the criteria for Tier I MNA in accordance with USEPA guidance (USEPA 2007a,b).

7.0 TIER II EVALUATION

The purpose of the Tier II evaluation is to "Identify mechanisms and rates of the operative attenuation process." Based on this definition, the following modeling results and observations support MNA as a viable corrective measure for the CCR Unit:

- **Adsorption Capacity Modeling:** PHREEQC modeling results show that adsorption is likely attenuating arsenic, cobalt and, to a lesser degree, molybdenum downgradient of the CCR Unit. This is concluded based on equilibration of site-specific groundwater compositions with the range of Hfo and Hao concentrations observed in SEP results of Site overburden soils. Minor amounts of boron are also expected to attenuate. The sorbing capacity of Hfo and Hao surface sites is partially dependent on the concentrations of the constituents of interest in groundwater. The titration modeling (Figure 15) shows how the soil's capacity to adsorb constituents increases if groundwater concentrations of arsenic, boron, cobalt, and molybdenum were to increase above current levels. In addition to metal oxyhydroxides, clay minerals and/or particular organics can also act as a substrate for attenuation (Goldberg et al. 1993; Goldberg and Forster 1996), but this mechanism was not included in the current evaluation.

  The findings from the modeling are supported by the results of the sequential extraction testing. The presence of arsenic, cobalt, lithium, and molybdenum in the amorphous and metal oxyhydroxide fractions of soils indicates that adsorption is occurring spatially across the monitored area downgradient of the CCR Unit.

- **Co-precipitation:** In addition to adsorption, co-precipitation or the direct incorporation of trace metals such as cobalt into precipitated iron oxide-oxyhydroxides has been well studied in literature (Butt et al. 2000; Dzombak and Morel 1990; Smith 1999). For the soils analyzed by sequential extraction (Section 3.2.2), all samples had higher concentrations of cobalt in the amorphous and metal hydroxide phases than indicated by adsorption modeling. This suggests that cobalt concentrations also may be attenuated during the formation of ferrihydrite (Butt et al. 2000; Tebo et al. 2004). Cobalt was also identified by SEP to be associated with carbonate minerals, likely the result of co-precipitation with dolomite or calcite, which were identified by mineralogical analysis. Arsenic co-precipitation with amorphous phases of iron and other metal oxyhydroxides is also possible. However, there was no arsenic associated with carbonate minerals as identified by SEP. Co-precipitation is either not likely or relevant for boron, lithium, and molybdenum.

- **Estimated Site Attenuation Rates:** Concentrations of boron, cobalt, lithium, and molybdenum are decreasing in downgradient monitoring wells, resulting in negative calculated point decay rates. A positive point decay rate for arsenic suggests that its concentrations are increasing, but low concentrations in porewater indicate that the trend does not imply an impact from the CCR Unit. Increasing arsenic concentrations in Assessment Monitoring wells GAMW-52B, GAMW-53B, GAMW-54, and GAMW-54B are

driving the positive point decay rate, but the arsenic concentrations in these wells are low (less than 0.005 mg/L) and are likely driven by natural variability. Using the mean decay rate, maximum concentrations of boron, cobalt and molybdenum observed in downgradient and Assessment monitoring wells would take approximate 41 years, 39 years, and 20 years, respectively, to attenuate to below GWPS. Arsenic and lithium concentrations in downgradient and Assessment Monitoring wells are already below the GWPS.

- **Advanced Groundwater Modeling:** Groundwater flow results indicate between 32% and 63% dilution and dispersion of groundwater at monitoring wells with upgradient and side-gradient water as it flows towards the Assessment Monitoring wells. This dilution and dispersion attenuate concentrations along the flow paths. Arsenic, cobalt, and lithium concentrations in porewater are already below GWPS in the available monitoring data (August 2018 to March 2020). Dilution and dispersion with groundwater from side-gradient Assessment Monitoring wells (GAMW-52/52B and GAMW-56/56B) would further reduce these concentrations relative to the GWPS. Boron and molybdenum concentrations are elevated above the health-based standards in porewater (and in background wells for boron). As such, while dilution and dispersion reduce concentrations by about 30% to 60%, this is insufficient to dilute porewater to such a degree that the resulting boron and molybdenum concentration decline to below the health-based standards. The concentrations of molybdenum measured in downgradient groundwater at Assessment Monitoring wells have remained below the GWPS, so additional physical and/or chemical attenuation is likely occurring between the CCR Unit and the Assessment Monitoring wells. Modeled groundwater velocities indicate that travel times between downgradient and Assessment Monitoring wells are between 4.5 and 31 years. The modeling results also indicate that groundwater would take between 27 and 130 years to travel from the downgradient monitoring wells to the property boundary (GAMW-46/46B).

Based on these findings, arsenic, boron, cobalt, lithium, and molybdenum were considered to be candidates for an MNA remedy application and deemed to meet the criteria for Tier II MNA in accordance with USEPA guidance (USEPA 2007a and 2007b).

8.0 TIER III EVALUATION

According to USEPA (USEPA 2007a), the purpose of the Tier III evaluation is to eliminate sites for an MNA remedy where (1) “Capacity of the aquifer is insufficient to attenuate the COC mass to regulatory standards” and/or (2) “Stability of the immobilized COC is insufficient to prevent remobilization due to future changes in groundwater chemistry”. Based on this definition, the following observations support MNA as a viable corrective measure for the CCR Unit:

- **Adsorption Capacity Modeling:** For arsenic, titration modeling shows that groundwater concentrations could increase up to approximately 2.5 mg/L before exceeding the capacity of soils (95th percentile of scenarios) to attenuate arsenic below the GWPS (0.091 mg/L). Groundwater arsenic concentrations up to 10 mg/L are predicted to attenuate below the GWPS for the average soil capacity scenario. Similarly, cobalt concentrations in groundwater could increase up to approximately 0.02 mg/L before exceeding the capacity of soils (95th percentile of scenarios) to attenuate cobalt below the GWPS (0.01 mg/L). Under the average soil capacity scenario, the aquifer has the capacity to reduce cobalt concentrations as high as 0.1 mg/L to below the GWPS.

  For boron and molybdenum, modeling suggests that adsorption can reduce a portion of the dissolved load, but that there is not sufficient adsorption capacity alone to reduce the concentrations observed in porewater below the health-based standard. However, current molybdenum concentrations observed in downgradient

and Assessment Monitoring wells indicate that the combined long-term attenuation from sorption, dilution, and dispersion is sufficient to reduce concentrations below health-based standards. In addition to iron oxyhydroxides, molybdenum and boron (as well as arsenic and cobalt) are known to adsorb to other metal (hydr)oxides (e.g., manganese, aluminum), clay minerals and particulate organic matter, providing additional sorption capacity in the soils.

- **Stability Modeling for Adsorbed Constituents:** Stability modeling indicates that for the conditions (i.e. pH, Eh, and TDS ranges) determined in groundwater at the Site, adsorbed species of arsenic, boron, cobalt, and molybdenum are relatively stable and remain attenuated. The modeling results further suggest that the adsorption of arsenic, cobalt, and molybdenum could be reversed with sufficiently large fluctuations in pH and Eh conditions at the Site, but there is no historical basis to expect such occurrences. Based on the mineralogical test results for Site soils, carbonate minerals are widely distributed downgradient of the CCR Unit. Groundwater that is in contact with carbonate minerals is typically buffered against large fluctuations in pH. Total alkalinity concentrations in groundwater at the Site (generally between 50 and 410 mg $CaCO_3$/L) support the notion that the groundwater has significant buffering capacity.

  Modeling results also indicate that increasing TDS concentrations could result in an increase in aqueous concentrations of arsenic, cobalt, and molybdenum due to competition for sorption sites. However, the impact is predicted to be relatively minor over the range of TDS concentrations observed at the site. The maximum TDS concentration measured in porewater was 3,830 mg/L and even at those levels, there is sufficient attenuation capacity from the soils to maintain arsenic, boron, cobalt, and molybdenum concentrations below GWPS

9.0 CONCLUSIONS

Golder performed a supplemental Assessment Monitoring followed by an attenuation evaluation, which serve as the Tier I, II, and III evaluation of MNA feasibility at RMSGS for arsenic, boron, cobalt, lithium, and molybdenum with respect to the CCR Unit. This evaluation has been completed in accordance with guidance and best practices promulgated by the USEPA (USEPA 2007a and 2007b) and the ITRC (ITRC 2010). Based on the results of this evaluation, Golder makes the following assessment for the individual parameters:

- Arsenic: Physical and chemical attenuation is occurring and co-precipitation is possible, levels are stable, and the aquifer has the capacity to attenuate arsenic. Arsenic is a candidate for MNA at the RMSGS Site.
- Boron: Physical attenuation of boron is occurring at the RMSGS based on substantial decreases of boron in assessment wells. However, the high levels of boron upgradient of the CCR impoundments make it difficult to determine if the evaluation of if MNA will be successful. An alternative or natural source of boron should be further investigated prior to making a MNA determination for boron based on current findings.
- Cobalt: Chemical and physical attenuation is occurring and co-precipitation is possible, levels are stable, and the aquifer has the capacity to attenuate arsenic. Cobalt is a candidate for MNA at the RMSGS Site.
- Lithium: Physical attenuation is occurring, levels are stable, and the aquifer has the capacity to attenuate arsenic. Lithium is a candidate for MNA at the RMSGS Site.
- Molybdenum: Physical and some chemical attenuation is occurring, levels are stable, and the aquifer has the capacity to attenuate arsenic. Molybdenum is a candidate for MNA at the RMSGS Site.

Therefore, it is recommended that a Tier IV evaluation be completed to design a long-term monitoring plan and contingent remedy for arsenic, boron, cobalt, lithium, and molybdenum.

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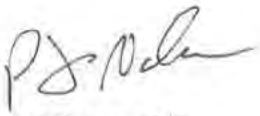
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Tables

Table 4: Summary of Travel Time Simulations and Attenuation Estimates
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

	Shallow Flow Paths				Deep Flow Paths			
Starting Well	**GAMW-16**	**GAMW-18**	**GAMW-17B**	**GAMW-09B**	**GAMW-16B**	**GAMW-18B**	**GAMW-17B**	**GAMW-09B**
Ending Well	**GAMW-53**	**GAMW-55**	**GAMW-54B**	**GAMW-54B**	**GAMW-53B**	**GAMW-55B**	**GAMW-54B**	**GAMW-54B**
Distance (ft)	**1521**	**1964**	**1200**	**1714**	**1521**	**1964**	**1200**	**1714**
Effective Porosity = 16%								
Travel Time (years)	4.8	11.0	4.5	8.9	5.0	11.0	5.5	9.0
Velocity (ft/year)	317	179	267	193	304	179	218	190
Time to Davis Ditch (years)	5.5	-	-	-	6	-	-	-
Time to property boundry near GAMW46B (years)	-	27	49	41	-	28.5	45	41
Effective Porosity = 30%								
Travel Time (years)	8.5	19.8	8.0	16.0	8.9	20.0	10.0	16.5
Velocity (ft/year)	179	99	150	107	171	98	120	104
Time to Davis Ditch (years)	10	-	-	-	9.9	-	-	-
Time to property boundry near GAMW46B (years)	-	49.8	79	75	-	51.5	80	76
Effective Porosity = 46%								
Travel Time (years)	13.0	31.0	12.0	25.0	13.5	29.0	15.0	25.0
Velocity (ft/year)	117	63	100	69	113	68	80	69
Time to Davis Ditch (years)	15	-	-	-	15	-	-	-
Time to property boundry near GAMW46B (years)	-	76.8	122	117	-	77	130	120
Estimate of Dilution/Attenuation Along Flow Path								
Starting concentration (mg/L)	9.7	13	12	12	9.7	13	12	12
End concentration (mg/L)	3.1	8.2	6.4	6.4	3.1	8.2	6.4	6.4
End Concentration as % of starting concentration	32%	63%	53%	53%	32%	63%	53%	53%
Dilution/Attenuation along flow path	68%	37%	47%	47%	68%	37%	47%	47%

Notes:
ft = feet
mg/L = milligrams per liter

Prepared by: GOL
Checked by: PJN
Reviewed by: RWB

Table 5: Groundwater Geochemical Modeling Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAPIEZ06 08-2018	GAPIEZ06 09-2018	GAPIEZ06 10-2018	DAPZ-02A 03-2020	DAPZ-02B 03-2020	GAMW04 10-2018	GAMW04 04-2019	GAMW04 11-2019	GAMW07 10-2018	GAMW07 05-2019	GAMW07 11-2019	GAMW07B 09-2018	GAMW07B 10-2018	GAMW07B 05-2019	GAMW07B 11-2019
Charge Balance	% error	-3.9	-1.3	-5.5	-7.8	-4.3	5.1	-1.3	-9.0	-3.7	-3.7	**-10.8**	**82.8**	-6.8	-7.0	**-10.1**
MINERAL PHASES - Saturation Indices [a]																
Otavite	$CdCO_3$	-2.3	-2.3	-1.1	-3.2	-2.6	-2.9	-3.1	-2.4	-3.8	-2.3	-2.1	-1.5	-3.2	-2.4	-2.8
Ferrihydrite	$Fe(OH)_3$	**2.1**	**2.1**	**3.1**	**0.5**	**2.2**	**2.9**	**1.4**	**0.5**	-6.6	**1.9**	**0.4**	**3.6**	-1.6	**4.2**	**-0.2**
Siderite	$FeCO_3$	**-0.1**	**-0.1**	-0.8	**-0.4**	-0.7	-2.1	**0.5**	-1.7	-3.3	-3.6	-1.4	**1.1**	-0.5	-0.7	**-0.3**
Melanterite	$FeSO_4 7H_2O$	-4.9	-5.0	-7.2	-4.5	-5.1	-6.1	-4.0	-6.5	-6.7	-8.3	-6.5	-6.8	-4.4	-5.3	-4.5
Anglesite	PbSO	-4.5	-4.5	-6.1	-4.2	-4.4	-4.0	-4.2	-4.5	-4.2	-4.5	-4.7	-7.4	-4.0	-4.3	-4.1
Gypsum	$CaSO_4:2H_2O$	-0.6	-0.6	-0.6	-0.7	-1.0	**0.0**	**-0.4**	-0.7	-0.6	-0.7	-0.7	-2.5	**-0.2**	**-0.2**	**-0.2**
Jarosite-H	$(H_3O)Fe_3(SO_4)_2(OH)_6$	-7.1	-6.9	-11.4	-7.6	-5.6	-3.6	-8.9	-10.7	-26.4	-6.7	-12.2	-10.2	-15.0	-0.7	-12.1
Jarosite-K	$KFe_3(SO_4)_2(OH)_6$	**-0.4**	**-0.3**	-3.0	-2.1	**1.3**	**4.5**	-1.3	-4.3	-21.4	**0.2**	-5.3	-2.2	-8.4	**6.8**	-5.1
Jarosite-Na	$NaFe_3(SO_4)_2(OH)_6$	-2.5	-2.4	-4.9	-5.0	-1.8	**1.6**	-3.0	-6.7	-24.5	-3.0	-8.6	-4.3	-10.6	**4.5**	-7.6
Calcite	$CaCO_3$	**0.3**	**0.2**	**1.8**	-0.6	**-0.4**	**0.0**	**0.1**	**0.1**	-1.2	**0.2**	**0.4**	**1.3**	**-0.3**	**0.4**	**0.0**
Magnesite	$MgCO_3$	-0.9	-1.0	**0.5**	-2.1	-1.7	-1.5	-1.4	-1.3	-2.6	-1.1	-0.9	**0.0**	-1.5	-0.8	-1.3
Barite	BaSO	**0.7**	**0.6**	**0.7**	**1.0**	**0.9**	**0.9**	**1.1**	**0.9**	**0.9**	**0.9**	**0.7**	-1.2	**1.2**	**1.1**	**1.0**
Witherite	$BaCO_3$	-3.8	-3.9	-2.3	-4.4	-3.9	-4.4	-3.7	-3.6	-5.1	-3.7	-3.5	-2.7	-4.3	-3.6	-4.1
Fluorite	CaF_2	-1.0	-0.8	-1.0	-2.0	-2.4	-2.3	-1.5	-2.1	-1.1	-0.8	-1.0	**0.8**	**-0.4**	-0.6	-0.6
CoCO3	$CoCO_3$	-4.2	-4.4	-2.9	-4.3	-4.2	-4.1	-4.2	-4.3	-4.3	-3.1	-3.0	-3.2	-5.0	-4.2	-4.6
Cerrusite	$PbCO_3$	-2.0	-2.1	-2.1	-2.6	-2.0	-2.2	-2.0	-2.1	-3.2	-2.0	-2.0	-1.9	-2.5	-2.0	-2.2
Carbon Dioxide	$pCO_2(g)$ [b]	-2.3	-2.2	-4.5	-1.0	-1.8	-2.4	-2.4	-1.7	**-0.3**	-1.8	-2.1	-3.2	-1.6	-2.4	-2.0

Notes:
Charge balances errrors highlighted in **red** are greater than +/-10%
Non-detect values assumed equal to 1/2 analytical detection limit
Redox converted from field ORP to Eh by +200 mV
[a] Saturation indices greater than -0.5 are identified by bold type and grey shading
[b] pCO2(g) values presented at $10^{\wedge value}$ atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW08 10-2018	GAMW08 05-2019	GAMW08 11-2019	GAMW08B 09-2018	GAMW08B 10-2018	GAMW08B 05-2019	GAMW08B 11-2019	GAMW09 10-2018	GAMW09 05-2019	GAMW09 11-2019	GAMW09B 09-2018	GAMW09B 10-2018	GAMW09B 05-2019	GAMW09B 11-2019
Charge Balance	% error	-2.9	-3.7	-6.6	-9.7	**-12.2**	-8.3	**-11.7**	-5.0	-5.0	-6.0	-5.7	-6.7	-3.0	-6.5
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-2.5	-2.1	-2.0	-2.3	-2.5	-2.5	-2.2	-3.0	-2.8	-2.8	-2.4	-2.3	-2.2	-2.2
Ferrihydrite	$Fe(OH)_3$	**1.7**	**2.3**	**2.4**	**1.8**	**3.1**	**4.1**	**3.6**	**0.2**	**1.3**	**0.7**	**2.0**	**2.5**	**3.7**	**2.2**
Siderite	$FeCO_3$	-1.8	-2.2	-2.1	**0.2**	**0.1**	**-0.4**	**0.1**	-2.3	-3.1	-2.5	**-0.2**	**-0.1**	**-0.2**	**0.1**
Melanterite	$FeSO\ 7H_2O$	-6.7	-7.3	-7.2	-4.5	-4.4	-4.9	-4.6	-6.7	-7.3	-7.0	-5.1	-5.1	-5.2	-5.0
Anglesite	PbSO	-4.6	-4.8	-4.8	-4.4	-4.2	-4.2	-4.4	-4.3	-4.2	-4.3	-4.5	-4.6	-4.7	-4.7
Gypsum	$CaSO :2H_2O$	-0.7	-0.6	-0.5	**-0.2**	**-0.2**	**-0.2**	**-0.2**	-0.7	-0.6	-0.8	-0.8	-0.7	-0.8	-0.9
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-6.6	-6.5	-6.5	-8.4	-3.5	-0.9	-3.6	-10.6	-8.2	-10.1	-6.8	-6.1	-2.6	-7.3
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	**0.0**	**0.9**	**1.0**	-1.3	**3.4**	**6.2**	**4.0**	-4.3	-1.3	-3.7	**-0.3**	**0.5**	**4.2**	-0.7
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	-2.9	-2.1	-1.9	-3.1	**1.4**	**4.3**	**2.0**	-7.1	-4.2	-6.5	-2.2	-1.5	**2.1**	-2.9
Calcite	$CaCO_3$	**0.2**	**0.5**	**0.7**	**0.6**	**0.3**	**0.3**	**0.6**	**-0.3**	**-0.3**	**-0.4**	**0.0**	**0.3**	**0.2**	**0.2**
Magnesite	$MgCO_3$	-1.2	-0.7	-0.6	-0.9	-1.1	-1.2	-0.8	-2.0	-1.8	-2.0	-1.0	-0.8	-0.8	-0.8
Barite	BaSO	**0.7**	**0.9**	**1.0**	**1.0**	**0.9**	**0.8**	**0.8**	**0.6**	**0.8**	**0.6**	**0.8**	**0.8**	**0.7**	**0.5**
Witherite	$BaCO_3$	-3.7	-3.3	-3.2	-3.6	-4.0	-4.0	-3.7	-4.3	-4.2	-4.3	-3.7	-3.6	-3.6	-3.7
Fluorite	CaF_2	**-0.4**	**-0.1**	**-0.2**	**-0.4**	**-0.5**	**-0.2**	**-0.3**	-1.9	-1.9	-1.9	-0.5	-0.6	-0.6	-0.6
CoCO3	$CoCO_3$	-2.9	-2.8	-2.5	-4.0	-4.4	-4.3	-4.0	-4.8	-4.7	-4.8	-4.1	-4.3	-4.4	-4.0
Cerrusite	$PbCO_3$	-2.2	-1.9	-1.9	-2.0	-2.1	-2.1	-1.9	-2.4	-2.2	-2.3	-2.1	-2.0	-2.0	-2.0
Carbon Dioxide	$pCO_2(g)$ [b]	-1.5	-1.8	-2.0	-2.6	-2.3	-2.5	-2.7	-1.7	-2.1	-2.0	-2.1	-2.2	-2.2	-2.4

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW15 10-2018	GAMW15 05-2019	GAMW15 11-2019	GAMW15B 09-2018	GAMW15B 10-2018	GAMW15B 05-2019	GAMW15B 11-2019	GAMW16 10-2018	GAMW16 05-2019	GAMW16 11-2019	GAMW16B 09-2018	GAMW16B 10-2018	GAMW16B 05-2019	GAMW16B 11-2019
Charge Balance	% error	0.4	-4.5	-7.1	-5.7	-3.8	-5.0	-5.3	-0.7	-7.5	8.2	-3.0	-2.7	-4.4	-8.7
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-4.3	-2.6	-2.3	-2.0	-3.0	-2.5	-2.3	-2.3	-2.2	-4.1	-1.8	-2.7	-2.4	-2.1
Ferrihydrite	$Fe(OH)_3$	-6.2	**2.7**	**2.5**	**3.3**	-2.6	**3.8**	**1.1**	**0.0**	**3.3**	**4.1**	**4.1**	**0.5**	**4.2**	**3.8**
Siderite	$FeCO_3$	-1.6	**0.1**	**0.2**	**0.0**	-0.9	-0.8	**0.0**	**-0.3**	-0.7	-3.0	**0.6**	**-0.1**	**-0.1**	**0.5**
Melanterite	$FeSO\ 7H_2O$	-4.7	-4.4	-4.9	-5.1	-5.0	-5.2	-4.8	-5.3	-5.6	-6.2	-4.8	-4.6	-4.8	-4.5
Anglesite	PbSO	-4.3	-4.4	-4.7	-4.7	-4.1	-4.2	-4.5	-4.6	-4.5	-4.1	-4.9	-4.3	-4.4	-4.6
Gypsum	$CaSO :2H_2O$	-1.1	-0.9	-1.1	-0.6	-0.6	**-0.3**	**-0.4**	-0.9	-0.6	-0.6	**-0.4**	**-0.4**	**-0.3**	**-0.3**
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-23.5	-4.2	-5.9	-4.8	-18.1	-1.4	-10.2	-13.0	-3.6	-2.5	-2.9	-9.9	-0.7	-3.0
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	-19.4	**2.5**	**0.5**	**2.3**	-12.0	**5.9**	-3.2	-6.6	**3.4**	**4.5**	**4.3**	-3.7	**6.4**	**4.3**
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	-21.9	**-0.1**	-2.0	**0.3**	-13.9	**3.9**	-5.3	-9.1	**0.8**	**1.9**	**2.1**	-5.9	**4.1**	**2.6**
Calcite	$CaCO_3$	-2.1	**-0.3**	**-0.1**	**0.6**	**-0.4**	**0.2**	**0.4**	**0.1**	**0.3**	-1.5	**0.9**	**0.1**	**0.4**	**0.7**
Magnesite	$MgCO_3$	-3.4	-1.4	-1.3	-0.8	-1.8	-0.9	-1.0	-1.4	-1.1	-3.0	**-0.5**	-1.4	-0.9	-0.7
Barite	BaSO	**0.5**	**0.8**	**0.5**	**1.1**	**1.0**	**1.4**	**1.0**	**0.5**	**0.7**	**0.6**	**1.0**	**1.0**	**1.2**	**1.1**
Witherite	$BaCO_3$	-5.8	-4.0	-3.8	-3.1	-4.2	-3.5	-3.5	-3.9	-3.7	-5.6	-3.0	-3.9	-3.4	-3.2
Fluorite	CaF_2	-1.3	-1.5	-1.3	-1.4	-1.3	-1.0	-0.9	-0.8	-0.8	-0.8	-1.0	-1.1	-1.0	-0.9
CoCO3	$CoCO_3$	-5.5	-3.6	-3.6	-4.0	-4.8	-4.3	-4.1	-4.1	-4.0	-5.8	-3.6	-4.5	-4.2	-3.9
Cerrusite	$PbCO_3$	-3.7	-2.1	-2.1	-1.9	-2.4	-2.0	-2.0	-2.1	-2.0	-3.4	-1.9	-2.3	-2.0	-2.0
Carbon Dioxide	$pCO_2(g)$ [b]	**0.1**	-1.9	-2.1	-2.6	-1.5	-2.2	-2.4	-2.0	-2.2	-4.8	-2.7	-1.7	-2.3	-2.6

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW17 10-2018	GAMW17 05-2019	GAMW17 11-2019	GAMW17B 09-2018	GAMW17B 10-2018	GAMW17B 05-2019	GAMW17B 11-2019	GAMW18 10-2018	GAMW18 04-2019	GAMW18 11-2019	GAMW18B 09-2018	GAMW18B 10-2018	GAMW18B 04-2019	GAMW18B 11-2019
Charge Balance	% error	0.8	-0.5	-6.6	-3.6	1.1	0.6	-4.3	**-10.9**	-6.4	-9.2	-3.2	**-10.4**	**-48.7**	**-10.9**
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-2.8	-2.2	-1.9	-2.0	-2.2	-2.3	-2.0	-3.0	-3.0	-2.5	-2.0	-2.9	-4.7	-2.1
Ferrihydrite	$Fe(OH)_3$	-2.9	**2.5**	**2.9**	**3.3**	**0.1**	**3.6**	**4.3**	-0.7	**1.7**	**0.9**	**2.8**	**0.6**	**2.1**	**2.2**
Siderite	$FeCO_3$	-2.1	-2.6	-2.6	**0.4**	**0.3**	**0.1**	**-0.1**	-2.5	-2.9	-1.8	**0.6**	-0.5	-5.1	**0.1**
Melanterite	$FeSO\ 7H_2O$	-6.8	-7.7	-8.1	-5.0	-4.9	-5.0	-5.5	-6.7	-6.8	-6.4	-4.5	-4.7	-7.3	-4.9
Anglesite	PbSO	-4.5	-4.8	-5.0	-4.9	-4.8	-4.8	-4.9	-4.3	-4.1	-4.3	-4.6	-4.1	-3.7	-4.6
Gypsum	$CaSO :2H_2O$	-0.8	-1.0	-1.1	-0.9	-0.9	-1.0	-0.9	-0.6	**-0.4**	**-0.3**	**-0.4**	**-0.5**	**-0.4**	-0.6
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-19.9	-6.7	-6.3	-4.5	-13.3	-2.1	-1.6	-12.0	-5.3	-9.3	-5.6	-8.8	-5.3	-7.6
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	-14.0	**0.2**	**0.6**	**2.5**	-6.5	**4.7**	**5.5**	-6.4	**0.8**	-2.8	**1.6**	-2.6	**1.1**	-0.5
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	-16.7	-2.4	-2.1	**0.2**	-8.8	**1.8**	**2.9**	-9.0	-1.7	-5.3	**-0.3**	-4.4	-2.5	-2.4
Calcite	$CaCO_3$	**-0.2**	**0.1**	**0.4**	**0.5**	**0.3**	**0.2**	**0.4**	**-0.4**	**-0.4**	**0.3**	**0.6**	**-0.3**	-2.1	**0.4**
Magnesite	$MgCO_3$	-1.4	-0.8	-0.7	-0.9	-1.0	-0.9	-0.7	-2.2	-2.1	-1.5	-0.6	-1.5	-4.6	-0.7
Barite	BaSO	**0.8**	**0.6**	**0.6**	**0.7**	**0.8**	**0.9**	**0.8**	**0.7**	**0.9**	**1.0**	**1.0**	**0.9**	**1.0**	**0.6**
Witherite	$BaCO_3$	-4.0	-3.6	-3.3	-3.2	-3.4	-3.3	-3.2	-4.5	-4.5	-3.8	-3.3	-4.3	-6.0	-3.7
Fluorite	CaF_2	**-0.5**	-0.6	-0.6	-1.1	-1.3	-1.3	-1.3	-3.3	-2.9	-2.3	-1.2	-1.3	-0.9	-1.0
CoCO3	$CoCO_3$	-4.6	-4.0	-3.8	-4.0	-4.0	-4.2	-3.8	-4.8	-5.2	-4.3	-4.1	-5.0	-6.8	-4.3
Cerrusite	$PbCO_3$	-2.4	-2.0	-2.0	-2.0	-2.0	-2.1	-2.0	-2.5	-2.4	-2.1	-2.0	-2.3	-3.8	-2.0
Carbon Dioxide	$pCO_2(g)$ [b]	-1.6	-2.4	-2.6	-2.3	-2.1	-1.7	-2.4	-1.2	-1.5	-1.8	-2.4	-1.5	-3.9	-2.4

Notes:
Charge balances errrors highlighted in **red** are greater than +/-10%
Non-detect values assumed equal to 1/2 analytical detection limit
Redox converted from field ORP to Eh by +200 mV
[a] Saturation indices greater than -0.5 are identified by bold type and grey shading
[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW52 09-2018	GAMW52 10-2018	GAMW52 05-2019	GAMW52 11-2019	GAMW52B 09-2018	GAMW52B 10-2018	GAMW52B 05-2019	GAMW52B 11-2019	GAMW53 09-2018	GAMW53 10-2018	GAMW53 04-2019	GAMW53 11-2019	GAMW53B 09-2018	GAMW53B 10-2018
Charge Balance	% error	-2.9	3.4	4.0	-1.3	-7.2	1.1	-1.7	-6.4	3.9	2.9	-1.5	1.3	-0.7	-1.6
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-1.9	-2.7	-2.3	-1.9	-1.6	-2.9	-2.3	-2.4	-3.5	-3.0	-4.0	-3.5	-2.2	-2.2
Ferrihydrite	$Fe(OH)_3$	**2.9**	**2.2**	**2.3**	**2.3**	**3.4**	**1.5**	**3.8**	**2.0**	**-0.1**	-1.9	-0.8	-1.1	**1.1**	**1.3**
Siderite	$FeCO_3$	-1.0	-2.7	-3.1	-1.3	**1.2**	**-0.1**	**-0.4**	**-0.1**	-1.4	-1.1	-2.9	-2.3	**0.1**	**0.1**
Melanterite	$FeSO\ 7H_2O$	-6.9	-8.4	-8.9	-7.3	-5.2	-5.3	-5.7	-5.3	-5.9	-6.0	-6.7	-6.7	-5.1	-5.1
Anglesite	PbSO	-5.4	-5.3	-5.5	-5.5	-5.9	-4.9	-5.0	-4.8	-4.4	-4.6	-4.5	-4.7	-4.8	-4.7
Gypsum	$CaSO :2H_2O$	-1.6	-2.0	-2.3	-1.7	-1.2	-1.2	-1.3	-1.1	-2.0	-1.9	-2.4	-2.3	-0.8	-0.7
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-6.2	-7.4	-7.9	-8.7	-7.5	-8.4	-2.7	-7.4	-9.6	-16.9	-11.6	-13.6	-9.8	-9.2
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	**0.3**	-1.3	-1.7	-2.0	**0.1**	-1.9	**4.2**	-0.7	-5.0	-11.7	-6.6	-8.6	-3.6	-2.8
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	-2.4	-4.1	-4.5	-4.7	-1.8	-3.8	**2.2**	-2.6	-7.9	-14.6	-9.6	-11.7	-5.6	-4.8
Calcite	$CaCO_3$	**0.2**	**-0.4**	**-0.4**	**0.2**	**1.1**	**0.0**	**0.1**	**0.1**	-1.7	-1.1	-2.6	-2.0	**0.3**	**0.3**
Magnesite	$MgCO_3$	-1.1	-1.6	-1.5	-1.0	**-0.2**	-1.3	-1.1	-1.2	-2.9	-2.4	-3.5	-3.0	-1.3	-1.3
Barite	BaSO	**0.0**	-0.6	-0.8	**-0.3**	**1.1**	**1.1**	**1.1**	**1.3**	**-0.3**	**-0.3**	**-0.3**	**-0.3**	**0.6**	**0.7**
Witherite	$BaCO_3$	-3.5	-4.3	-4.3	-3.7	-1.9	-3.1	-2.8	-2.9	-5.3	-4.8	-5.9	-5.3	-3.5	-3.5
Fluorite	CaF_2	-2.0	-2.2	-2.4	-2.1	**0.4**	-2.4	-2.4	-2.3	-2.8	-2.7	-4.8	-4.7	-1.5	-1.6
CoCO3	$CoCO_3$	-3.7	-4.4	-4.2	-3.8	-3.2	-4.5	-4.0	-4.1	-5.1	-4.6	-5.9	-5.4	-4.0	-4.0
Cerrusite	$PbCO_3$	-2.0	-2.1	-2.0	-2.0	-2.0	-2.2	-2.0	-2.1	-2.6	-2.3	-3.1	-2.8	-2.1	-2.1
Carbon Dioxide	$pCO_2(g)$ [b]	-2.1	-1.8	-1.9	-2.3	-3.0	-1.8	-2.1	-2.1	-0.9	-1.3	-1.2	-1.3	-1.9	-2.0

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW53B 04-2019	GAMW53B 11-2019	GAMW54 09-2018	GAMW54 10-2018	GAMW54 04-2019	GAMW54 11-2019	GAMW54B 09-2018	GAMW54B 10-2018	GAMW54B 05-2019	GAMW54B 11-2019	GAMW55 09-2018	GAMW55 10-2018	GAMW55B 09-2018	GAMW55B 10-2018
Charge Balance	% error	-2.8	-2.7	-1.7	2.0	-3.0	-3.0	-1.5	1.8	-6.0	-3.8	-1.3	0.7	-6.0	-2.6
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-2.1	-2.1	-3.3	-1.7	-2.8	-2.3	-2.7	-1.2	-2.4	-2.4	-2.8	-2.5	-2.6	-2.5
Ferrihydrite	$Fe(OH)_3$	**4.1**	**3.3**	**1.5**	**-0.3**	**1.4**	**1.0**	**1.0**	**2.9**	**3.4**	**2.8**	**2.1**	**0.9**	**1.2**	**1.7**
Siderite	$FeCO_3$	**-0.4**	**0.1**	-2.5	-0.6	-2.1	-1.1	**-0.1**	**1.5**	**0.1**	**0.1**	-1.2	-1.4	**-0.1**	**0.0**
Melanterite	$FeSO\ 7H_2O$	-5.8	-5.3	-6.7	-6.6	-6.6	-6.5	-4.7	-4.7	-4.8	-4.7	-5.8	-6.1	-4.7	-4.7
Anglesite	PbSO	-4.9	-4.9	-4.5	-5.4	-4.5	-5.1	-4.3	-5.8	-4.5	-4.5	-4.4	-4.5	-4.4	-4.4
Gypsum	$CaSO :2H_2O$	-0.9	-1.0	-1.3	-1.4	-1.2	-1.6	-0.6	-0.6	-0.6	-0.6	-0.6	-0.5	-0.5	**-0.5**
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-1.4	-4.2	-4.8	-17.1	-7.5	-10.3	-8.3	-9.7	-2.4	-3.8	-4.3	-9.0	-7.9	-6.8
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	**5.2**	**2.4**	**0.0**	-10.5	-1.7	-4.4	-2.1	-1.6	**4.2**	**2.7**	**1.7**	-2.6	-1.7	**-0.4**
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	**3.0**	**0.2**	-2.4	-12.9	-4.1	-7.0	-4.0	-3.6	**2.2**	**0.7**	-0.9	-5.2	-3.6	-2.3
Calcite	$CaCO_3$	**0.4**	**0.3**	-1.1	**0.5**	-0.7	**-0.2**	**-0.1**	**1.6**	**0.2**	**0.2**	**-0.1**	**0.1**	**0.1**	**0.2**
Magnesite	$MgCO_3$	-1.1	-1.2	-2.5	-0.8	-1.8	-1.5	-1.5	**0.2**	-1.1	-1.1	-1.7	-1.4	-1.4	-1.2
Barite	BaSO	**0.5**	**0.7**	**0.4**	**0.3**	**0.4**	**-0.1**	**1.1**	**1.1**	**1.1**	**1.1**	**1.0**	**0.9**	**1.3**	**1.2**
Witherite	$BaCO_3$	-3.5	-3.3	-4.8	-3.2	-4.4	-4.0	-3.7	-2.1	-3.5	-3.5	-3.8	-3.7	-3.5	-3.4
Fluorite	CaF_2	-1.5	-1.3	-2.6	-2.6	-2.7	-2.2	-1.7	-1.5	-1.4	-1.3	-1.4	-1.5	-2.0	-2.1
CoCO3	$CoCO_3$	-3.9	-3.9	-5.1	-3.5	-4.6	-4.2	-4.5	-3.0	-4.2	-4.2	-3.5	-3.4	-4.6	-4.3
Cerrusite	$PbCO_3$	-2.0	-2.1	-2.8	-2.0	-2.2	-2.1	-2.3	-2.0	-2.1	-2.1	-2.4	-2.2	-2.3	-2.2
Carbon Dioxide	$pCO_2(g)$ [b]	-2.0	-2.2	-1.0	-2.7	-1.6	-1.7	-1.6	-3.5	-1.9	-1.8	-1.4	-1.7	-1.7	-1.9

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW55B 05-2019	GAMW55B 11-2019	GAMW55R 11-2019	GAMW56 09-2018	GAMW56 10-2018	GAMW56 04-2019	GAMW56 11-2019	GAMW56B 09-2018	GAMW56B 10-2018	GAMW56B 04-2019	GAMW56B 11-2019
Charge Balance	% error	-5.4	-6.2	-5.5	4.4	-1.6	61.8	3.5	0.7	2.6	-13.1	-4.8
MINERAL PHASES - Saturation Indices [a]												
Otavite	$CdCO_3$	-2.4	-2.2	-2.3	-2.4	-2.0	-2.7	-2.2	-2.3	-2.3	-2.3	-2.3
Ferrihydrite	$Fe(OH)_3$	**3.0**	**2.0**	**1.4**	**1.5**	**2.5**	**2.9**	**1.7**	**1.2**	**2.0**	**3.7**	**1.7**
Siderite	$FeCO_3$	**0.0**	**0.2**	-1.9	**0.5**	**0.8**	-0.7	**0.1**	**0.2**	**0.1**	**0.2**	**0.1**
Melanterite	$FeSO\ 7H_2O$	-4.8	-4.8	-6.9	-5.1	-5.1	-5.9	-5.6	-5.0	-5.2	-4.8	-4.9
Anglesite	PbSO	-4.5	-4.6	-4.6	-5.4	-5.5	-5.1	-5.4	-5.0	-5.1	-4.7	-4.7
Gypsum	$CaSO :2H_2O$	-0.6	-0.6	-0.8	-1.7	-1.7	-1.9	-1.7	-1.2	-1.3	-1.0	-0.9
Jarosite-H	$(H_3O)Fe_3(SO)_2(OH)_6$	-3.6	-7.1	-8.6	-8.3	-6.6	-4.3	-8.7	-8.8	-6.6	-1.5	-7.8
Jarosite-K	$KFe_3(SO)_2(OH)_6$	**2.9**	**-0.5**	-1.9	-2.5	**-0.4**	**2.4**	-2.6	-2.6	**-0.4**	**4.6**	-1.2
Jarosite-Na	$NaFe_3(SO)_2(OH)_6$	**1.0**	-2.4	-4.4	-5.4	-3.2	**0.4**	-5.7	-5.0	-2.7	**1.7**	-3.5
Calcite	$CaCO_3$	**0.2**	**0.4**	**0.2**	**-0.1**	**0.2**	-0.6	**0.1**	**0.0**	**0.0**	**0.0**	**0.1**
Magnesite	$MgCO_3$	-1.1	-1.0	-1.2	-1.5	-1.1	-1.2	-1.2	-1.2	-1.1	-1.3	-1.1
Barite	BaSO	**1.0**	**1.0**	**0.6**	**0.0**	**0.0**	**-0.1**	**-0.1**	**0.6**	**0.4**	**0.8**	**0.9**
Witherite	$BaCO_3$	-3.5	-3.4	-3.8	-3.7	-3.5	-4.2	-3.7	-3.6	-3.6	-3.5	-3.5
Fluorite	CaF_2	-2.0	-2.0	-1.3	-0.8	-1.0	-1.7	-1.2	-1.7	-1.9	-1.7	-1.7
CoCO3	$CoCO_3$	-4.2	-4.0	-4.1	-3.8	-2.9	-3.4	-2.9	-4.2	-4.2	-4.2	-4.2
Cerrusite	$PbCO_3$	-2.1	-2.1	-2.1	-2.2	-2.0	-2.2	-2.1	-2.1	-2.1	-2.0	-2.0
Carbon Dioxide	$pCO_2(g)$ [b]	-2.0	-2.1	-2.0	-1.2	-1.6	-1.6	-1.6	-1.4	-1.3	-1.6	-1.8

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Prepared by GOL
Checked by PJN
Reviewed by RV

Table 6: Average Point Decay Rates in Background and Downgradient Wells
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Constituent	Units	Point Decay Constants (first-order decay)	
		Background Wells	All Downgradient Wells (including Assessment Wells)
Arsenic	yr^{-1}	-0.33	**0.11**
Boron	yr^{-1}	0.04	**-0.04**
Cobalt	yr^{-1}	0.36	**-0.05**
Lithium	yr^{-1}	0.20	**-0.06**
Molybdenum	yr^{-1}	0.28	**-0.03**

Notes:
yr^{-1} = rate per year

Prepared by: GOL
Checked by: PJN
Reviewed by: RV

Table 7: Summary of Rietveld Quantitative Analysis X-Ray Diffraction Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Mineral	Mineral Formula	OW-9 18-20' (wt %)	OW-9 10-12' (wt %)	SB-52B-35'-37' (wt %)	SB-54B-30'-32' (wt %)	SB-56B-30'-32' (wt %)
Quartz	SiO_2	69	60	53	61	72
Pyrite	FeS_2	-	-	0.39	0.10	0.12
Marcasite	FeS_2	-	-	0.22	-	-
Muscovite	$KAl_2(AlSi_3O_{10})(OH)_2$	3.6	3.5	7.8	1.7	1.3
Biotite	$K(Mg,Fe)_3(AlSi_3O_{10})(OH)_2$	-	-	1.1	0.57	0.16
Chlorite	$(Fe,(Mg,Mn)_5,Al)(Si_3Al)O_{10}(OH)_8$	-	-	2.6	1.0	1.1
Microcline	$KAlSi_3O_8$	5.2	9.1	9.2	7.5	6.6
Orthoclase	$KAlSi_3O_8$	-	-	2.2	0.65	0.57
Hematite	Fe_2O_3	-	-	0.26	0.44	0.57
Dolomite	$CaMg(CO_3)_2$	6.5	9.8	7.9	9.6	5.3
Calcite	$CaCO_3$	4.8	3.6	4.7	5.8	3.9
Albite	$NaAlSi_3O_8$	8.3	11	7.3	9.1	6.4
Epidote	$Ca_2(Al,Fe)Al_2O(SiO_4)(Si_2O_7)(OH)$	1.6	1.5	2.8	2.1	1.9
Anatase	TiO_2	-	-	-	-	-
Cancrinite	$Na_6Ca(CO_3)(AlSiO_4)_6 \cdot 2H_2O$	0.87	1.7	-	-	-
TOTAL		100	100	100	100	100

Notes:

wt % = percent by weight of each mineral

Non-detect minerals within a sample are represented with "-"

Prepared by: GOL
Checked by: PJN
Reviewed by: RV

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Aluminum	Total Metal Result	1900	3100 J+	2200 J+	1100	1300	3200	1500	1400	2000	2200	1600
Aluminum	SEP Step 1	52 U	48 U	47 U	47 U	51 U	44 U	48 U	44 U	49 U	48 U	49 U
Aluminum	SEP Step 2	15 J	63 J	16 J	35 UJ	38 UJ	8.8 J	11 J	33 UJ	12 J	36 UJ	5.9 J
Aluminum	SEP Step 3	44	540	60	15	31	33	75	30	34	23	29
Aluminum	SEP Step 4	300	1600	280	160	130	110	130	100	130	100	360
Aluminum	SEP Step 5	200 UJ	80 J	180 U	170 U	190 UJ	28 J	31 J	34 J	180 UJ	180 UJ	180 UJ
Aluminum	SEP Step 6	1000	1600	840	520	1100	1200	750	820	1400	1200	1300
Aluminum	SEP Step 7	22000	11000	23000	15000	23000	25000	16000	19000	23000	21000	25000
Aluminum	SEP SUM	23000	15000	24000	16000	24000	26000	17000	20000	24000	22000	27000
Aluminum	SEP TOTAL	25000	21000	29000	19000	23000	28000	18000	20000	29000	31000	23000
Antimony	Total Metal Result	7.7 U	18 U	17 U	17 U	7 U	6.3 UJ	6.9 UJ	6.6 UJ	7 U	7 U	7 U
Antimony	SEP Step 1	16 U	14 U	14 U	14 U	15 U	13 U	14 U	13 U	15 U	14 U	15 U
Antimony	SEP Step 2	12 U	11 U	11 U	10 U	12 U	10 U	11 U	10 U	11 U	11 U	11 U
Antimony	SEP Step 3	3.9 U	3.6 U	3.5 U	3.5 U	3.8 U	3.3 U	3.6 U	3.3 U	3.7 U	3.6 U	3.6 U
Antimony	SEP Step 4	3.9 U	3.6 U	3.5 U	3.5 U	3.8 U	3.3 U	3.6 U	3.3 U	3.7 U	3.6 U	3.6 U
Antimony	SEP Step 5	59 U	54 U	53 U	52 U	58 U	50 U	53 U	50 U	55 U	54 U	55 U
Antimony	SEP Step 6	3.9 U	3.6 U	3.5 U	3.5 U	3.8 U	3.3 U	3.6 U	3.3 U	3.7 U	3.6 U	3.6 U
Antimony	SEP Step 7	0.45 J	3.6 U	3.5 U	3.5 U	0.54 J	3.3 U	3.6 U	0.16 J	0.29 J	3.6 U	0.3 J
Antimony	SEP SUM	0.45 J	3 U	3 U	3 U	0.54 J	3 U	3 U	0.16 J	0.29 J	3 U	0.3 J
Antimony	SEP TOTAL	0.53 J	3.6 U	3.5 U	3.5 U	0.27 J	3.3 U	3.6 J	3.3 U	0.33 J	3.6 U	0.29 J
Arsenic	Total Metal Result	1.7 J	0.62 J	1.7 J	0.69 J	1.9 J	5.4 J	5	1.3 J	2.3	2 J	5
Arsenic	SEP Step 1	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	2.4 U
Arsenic	SEP Step 2	2 U	1.8 UJ	1.8 U	1.7 U	1.9 U	0.46 J	1.8 U	1.7 U	1.8 UJ	1.8 UJ	1.8 UJ
Arsenic	SEP Step 3	0.37 J	0.45 J	0.43 J	0.17 J	0.27 J	0.83	0.83	0.44 J	0.45 J	0.37 J	1.9
Arsenic	SEP Step 4	0.69	0.6 U	0.94	0.73	0.66	0.71 J+	0.59 U	0.56 U	0.68	0.5 J	1.1
Arsenic	SEP Step 5	9.8 U	9 U	8.8 U	8.7 U	9.6 U	8.3 UJ	8.9 UJ	8.3 UJ	9.1 U	9 U	9.1 U
Arsenic	SEP Step 6	1.2	0.3 J	0.56 J	0.54 J	1.7	2.2	1.6	0.89	1.8	1.4	3.8
Arsenic	SEP Step 7	1.3 U	0.7	0.39 J	0.34 J	1.3 U	1.2	1	0.88	1.2 U	0.6 U	1.2 U
Arsenic	SEP SUM	2.2	1.4	2.3	1.8	2.6	5.4	4	2.7	2.9	2.7	7.3
Arsenic	SEP TOTAL	2.1	2.2	1.9	3	3.1	5.4 J	5.6	2.5	4.7	3.9	6.2

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Barium	Total Metal Result	6.9 J+	7.3 J+	13	4.1	4.3 J+	8.4 J+	4.6 J+	4.3 J+	6.2	6.1	6.1
Barium	SEP Step 1	13 U	1.1 J	0.58 J	12 U	13 U	11 U	12 U	11 U	12 U	12 U	12 U
Barium	SEP Step 2	0.5 J	1.7 J	0.62 J	8.7 UJ	0.46 J	0.52 J	0.54 J	0.54 J	0.56 J	0.44 J	0.96 J
Barium	SEP Step 3	3.3 U	3.6	2.9 U	2.9 U	3.2 U	2.8 U	3 U	2.8 U	3 U	3 U	3 U
Barium	SEP Step 4	2.2 J	2.6 J	5.3	1.6 J	1.4 J	2.4 J	0.97 J	1.1 J	2.2 J	1.9 J	2.2 J
Barium	SEP Step 5	49 UJ	45 UJ	44 UJ	44 UJ	48 UJ	42 UJ	45 UJ	42 UJ	46 UJ	45 UJ	46 UJ
Barium	SEP Step 6	2.3 J	2.2 J	2.2 J	1.2 J	1.9 J	2 J	1.6 J	1.5 J+	2.3 J	2 J	2.4 J
Barium	SEP Step 7	250	230	350	220	220	250 J	190	220	230	190	260
Barium	SEP SUM	250	240	360	220	230	250	190	220	240	190	260
Barium	SEP TOTAL	270	300	390	210	190	200	170	200	220	200	230
Beryllium	Total Metal Result	1.3 U	0.053 J	0.12 J	0.064 J	1.2 U	0.19 J	1.1 U	1.1 U	1.2 U	1.2 U	1.2 U
Beryllium	SEP Step 1	1.3 U	1.2 U	1.2 U	1.2 U	1.3 U	1.1 U	1.2 U	1.1 U	1.2 U	1.2 U	1.2 U
Beryllium	SEP Step 2	0.98 UJ	0.9 UJ	0.88 UJ	0.87 UJ	0.96 UJ	0.83 UJ	0.89 UJ	0.83 UJ	0.91 UJ	0.9 UJ	0.91 UJ
Beryllium	SEP Step 3	0.33 U	0.026 J	0.021	0.29 U	0.32 U	0.28 U	0.3 U	0.28 U	0.3 U	0.3 U	0.3 U
Beryllium	SEP Step 4	0.33 U	0.026 J	0.024 J	0.02 J	0.32 U	0.28 U	0.3 U	0.28 U	0.3 U	0.3 U	0.03 J
Beryllium	SEP Step 5	4.9 UJ	4.5 UJ	4.4 UJ	4.4 UJ	4.8 UJ	4.2 UJ	4.5 UJ	4.2 UJ	4.6 UJ	4.5 UJ	4.6 UJ
Beryllium	SEP Step 6	0.045 J	0.024 J	0.036 J	0.027 J	0.039 J	0.042 J	0.026 J	0.027 J	0.045 J	0.037 J	0.067 J
Beryllium	SEP Step 7	0.29 J	0.21 J	0.39	0.24 J	0.31 J	0.35	0.23 J	0.28	0.3	0.25 J	0.46
Beryllium	SEP SUM	0.34	0.29	0.47	0.28	0.35	0.39	0.25	0.31	0.34	0.29	0.56
Beryllium	SEP TOTAL	0.37	0.3	0.41	0.28 J	0.26 J	0.35	0.25 J	0.27 J	0.33	0.27 J	0.33
Boron	Total Metal Result	26 U	5.5	7.4	3.6	23 U	21 U	23 U	22 U	23 U	23 U	23 U
Cadmium	Total Metal Result	0.64 U	0.24 U	0.11 J	0.072 J	0.59 U	0.53 U	0.57 U	0.55 U	0.58 U	0.58 U	0.3 J
Cadmium	SEP Step 1	1.3 U	1.2 U	1.2 U	1.2 U	1.3 U	1.1 U	1.2 U	1.1 U	1.2 U	1.2 U	1.2 U
Cadmium	SEP Step 2	0.98 U	0.9 U	0.88 U	0.87 U	0.96 U	0.83 U	0.89 U	0.83 U	0.91 U	0.9 U	0.91 U
Cadmium	SEP Step 3	0.33 U	0.3 UJ	0.29 UJ	0.29 UJ	0.32 U	0.28 UJ	0.3 UJ	0.28 UJ	0.3 UJ	0.3 UJ	0.3 UJ
Cadmium	SEP Step 4	0.077 J	0.059 J	0.09 J	0.083 J	0.076 J	0.086 J	0.08 J	0.076 J	0.069 J	0.065 J	0.059 J
Cadmium	SEP Step 5	4.9 U	4.5 U	4.4 U	4.4 U	4.8 U	4.2 U	4.5 U	4.2 U	4.6 U	4.5 U	4.6 U
Cadmium	SEP Step 6	0.33 U	0.3 U	0.29 U	0.29 U	0.32 U	0.28 U	0.3 U	0.28 U	0.026 J	0.013 J	0.3 U
Cadmium	SEP Step 7	0.33 U	0.3 U	0.29 U	0.29 U	0.32 U	0.28 U	0.3 U	0.28 U	0.3 U	0.3 U	0.3 U
Cadmium	SEP SUM	0.077 J	0.11 J	0.09 J	0.083 J	0.076 J	0.086 J	0.08 J	0.076 J	0.095 J	0.077 J	0.059 J
Cadmium	SEP TOTAL	0.015 J	0.3 U	0.29 U	0.29 U	0.065 J	0.28 U	0.3 U	0.28 U	0.18 J	0.12 J	0.058 J

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Chromium	Total Metal Result	4.3	2.9	4.4	2.5	2.8	8.2 J	5.1	3.4	5	6	3.2
Chromium	SEP Step 1	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	2.4 U
Chromium	SEP Step 2	2 UJ	1.8 U	0.28 J	1.7 U	1.9 UJ	0.37 J	0.37 J	1.7 U	0.31 J	1.8 U	1.8 U
Chromium	SEP Step 3	0.29 J	0.37 J	0.52 J	0.16 J	0.17 J	1.1	0.97	0.27 J	1.1	0.14 J	0.19 J
Chromium	SEP Step 4	1.2	1.1	0.94	0.57 J	0.55 J	0.68	0.58 J	0.51 J	0.73	0.6	1
Chromium	SEP Step 5	9.8 U	9 UJ	1.5 J	1.3 J	9.6 U	8.3 U	8.9 U	8.3 U	9.1 U	9 U	9.1 U
Chromium	SEP Step 6	2.5	0.99	2.1	1.7	3.1	3.5	2.2	2.2	3.7	3.3	3
Chromium	SEP Step 7	5.5	3.7	7.3	5.2	7.2	9	5	7.3	8.5	6.7	13
Chromium	SEP SUM	9.4	8.1	13	8.8	11	15	9.1	10	14	11	17
Chromium	SEP TOTAL	9.5	6.9	11	8.3	8.8	16 J	10	8.7	17	13	9.2
Cobalt	Total Metal Result	3.5 J	1.1	1.8	2.2	2.9 J	5.2 J	5.7	2.6 J	5.7 J	3.9 J	3 J
Cobalt	SEP Step 1	13 U	12 U	12 U	12 U	13 U	11 U	12 U	11 U	12 U	12 U	12 U
Cobalt	SEP Step 2	0.54 J	9 U	8.8 U	8.7 U	0.35 J	0.44 J	0.63 J	0.38 J	0.62 J	0.41 J	0.26 J
Cobalt	SEP Step 3	0.55 J	0.1 J	0.27 J	0.19 J	0.37 J	0.45 J	1.2 J	0.53 J	0.47 J	0.39 J	0.37 J
Cobalt	SEP Step 4	0.83 J	0.29 J	0.87 J	1.2 J	0.97 J	0.71 J	1.1 J	0.66 J	1.6 J	0.91 J	0.76 J
Cobalt	SEP Step 5	49 UJ	45 UJ	44 UJ	44 UJ	48 UJ	42 UJ	45 UJ	42 UJ	46 UJ	45 UJ	46 UJ
Cobalt	SEP Step 6	1.3 J	0.3 J	0.66 J	0.68 J	1.8 J	2.1 J	1.5 J	0.97 J	2.5 J	1.5 J	2.9 J
Cobalt	SEP Step 7	0.8 J	3 U	0.69 J	0.69 J	1.1 J	0.82 J	0.44 J	0.43 J	1.5 J	0.8 J	0.81 J
Cobalt	SEP SUM	4	0.69 J	2.5	2.8	4.6	4.5	4.8	3	6.7	4	5.1
Cobalt	SEP TOTAL	4.2 J	0.87 J	2.5 J	3.2	4.8 J	4.7 J	5.2 J	3.2	6.1	4.3	4.5 J
Iron	Total Metal Result	4900	1500	4400	2600	3400	6800	7900	3700	5800	5900	5600
Iron	SEP Step 1	26 U	24 U	23 U	23 U	26 U	22 U	24 U	22 U	24 U	24 U	24 U
Iron	SEP Step 2	260 J	31 J	61 J	29 J	190 J	130 J	200 J	99 J	280 J	160 J	140 J
Iron	SEP Step 3	950	280	710	150	600	590	2600	470	740	700	1200
Iron	SEP Step 4	1100	770	1700	1100	1000	1200	1100	830	1400	1500	1400
Iron	SEP Step 5	98 UJ	90 UJ	88 UJ	87 UJ	96 UJ	83 UJ	89 UJ	83 UJ	91 UJ	90 UJ	91 UJ
Iron	SEP Step 6	2600	870	2100	1500	2800	3300	2600	2000	3800	3300	4600
Iron	SEP Step 7	1800	1300	2400	2000	2900	2500	2000	2100	3700	2400	3100
Iron	SEP SUM	6700	3200	7100	4700	7600	7700	8500	5500	9900	8100	10000
Iron	SEP TOTAL	6300	3400	7500	5500	7000	8400	8700	5700	9900	8600	6800

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Lead	Total Metal Result	4.4	1.4	3.1	1.8	2.9	6.6 J	3.2	2.4	4.2	3.7	3.5
Lead	SEP Step 1	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	2.4 U
Lead	SEP Step 2	1.9 J	1.8 U	1.8 U	1.7 U	0.92 J	0.85 J	1.8 U	0.66 J	0.86 J	0.82 J	0.75 J
Lead	SEP Step 3	0.66 UJ	0.61 J	0.59 UJ	0.58 UJ	0.64 UJ	0.55 UJ	0.59 UJ	0.56 UJ	0.61 UJ	0.6 UJ	0.61 UJ
Lead	SEP Step 4	1.2	0.65	1.7	1.2	1.4	2.3	1.8	1.5	2.3	1.8	2
Lead	SEP Step 5	9.8 UJ	9 UJ	8.8 UJ	8.7 UJ	9.6 UJ	8.3 UJ	8.9 UJ	8.3 UJ	9.1 UJ	9 UJ	9.1 UJ
Lead	SEP Step 6	1.1	0.67	0.67	0.35 J	0.78	1.8	1.1	0.72	1.6	1.3	3.4
Lead	SEP Step 7	3.2	3.1	5.3	3.2	3.5	3.3	2.5	2.6	2.8	4.7	2.9
Lead	SEP SUM	7.4	5	7.7	4.8	6.6	8.2	5.3	5.5	7.5	8.6	9.1
Lead	SEP TOTAL	7	5.7	7.4	5.6	5	7.5 J	4.9	5.1	6.7	5.6	6.2
Lithium	Total Metal Result	4.6 J	1.4 J	3.6 J	2.2 J	3.3 J	6.6 J+	3.1 J+	3.4 J+	5.4 J	5.2 J	3.5 J
Lithium	SEP Step 1	13 U	12 U	12 U	12 U	13 U	11 U	12 U	11 U	12 U	12 U	12 U
Lithium	SEP Step 2	9.8 U	9 U	8.8 U	8.7 U	9.6 U	8.3 U	8.9 U	8.3 U	0.71 J	0.72 J	9.1 U
Lithium	SEP Step 3	3.3 U	3 U	2.9 U	2.9 U	3.2 U	2.8 U	3 U	2.8 U	3 U	3 U	3 U
Lithium	SEP Step 4	0.78 J	0.5 J	0.81 J	0.55 J	0.62 J	1 J	0.64 J	0.71 J	1.1 J	1 J	1.3 J
Lithium	SEP Step 5	49 U	45 U	44 U	44 U	48 U	42 U	45 U	42 U	46 U	45 U	46 U
Lithium	SEP Step 6	2.3 J	1.1 J	1.8 J	1.2 J	2.2 J	3	1.7 J	1.9 J	3.5	2.9 J	2.8 J
Lithium	SEP Step 7	4.4	2.5 J	3.4	2.1 J	3.8	6.1	2.6 J	3.1	5.6	4.2	7.1
Lithium	SEP SUM	12	4.1	6	3.8	11	14	7.8	5.7	19	18	19
Lithium	SEP TOTAL	8	4.2	6.8	5.4	7.5	10	6	7.5	11	10	7.2
Molybdenum	Total Metal Result	5.1 U	6.3	1.1 U	1.1 U	4.7 U	3.8 J	4 J	4.4 U	0.88 J	4.7 U	2.1 J
Molybdenum	SEP Step 1	10 U	13	9.4 U	9.3 U	10 U	8.9 U	9.5 U	8.9 U	9.8 U	9.6 U	9.7 U
Molybdenum	SEP Step 2	7.9 U	0.51 J	7 U	7 U	7.7 U	6.7 U	7.1 U	6.7 U	7.3 U	7.2 U	7.3 U
Molybdenum	SEP Step 3	2.6 U	1.2 J	2.3 U	2.3 U	2.6 U	0.51 J	2.2 J	0.27 J	0.59 J	2.4 U	0.5 J
Molybdenum	SEP Step 4	2.6 U	1.3 J	2.3 U	2.3 U	2.6 U	0.39 J	0.63 J	0.24 J	0.53 J	2.4 U	0.36 J
Molybdenum	SEP Step 5	39 U	36 U	35 U	35 U	38 U	33 U	36 U	33 U	37 U	36 U	1.7 J
Molybdenum	SEP Step 6	2.6 U	0.13 J	2.3 U	2.3 U	2.6 U	0.21 J	0.13 J	2.2 U	0.18 J	0.2 J	1.5 J
Molybdenum	SEP Step 7	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	0.16 J
Molybdenum	SEP SUM	2 U	16	2 U	2 U	2 U	1.1 J	3	0.51 J	1.3 J	0.2 J	4.3
Molybdenum	SEP TOTAL	0.94 J	15	0.22 J	0.15 J	0.54 J	2.4	3.8	0.67 J	2.4	0.48 J	2.4

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Selenium	Total Metal Result	1.9 U	4.8 U	4.6 U	4.6 U	0.53 J	1.6 U	0.51 J	0.74 J	0.68 J	0.65 J	1.8 U
Selenium	SEP Step 1	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	2.4 U
Selenium	SEP Step 2	2 U	1.8 U	1.8 U	1.7 U	1.9 U	1.7 U	1.8 U	1.7 U	1.8 UJ	1.8 UJ	1.8 UJ
Selenium	SEP Step 3	0.66 U	0.6 U	0.22 J	0.58 U	0.64 U	0.55 U	0.59 U	0.56 U	0.61 U	0.6 U	0.61 U
Selenium	SEP Step 4	1.1 J	0.6 UJ	0.6 J+	0.75 J+	1.3 J	0.64 J	0.59 UJ	0.56 UJ	0.71 J	0.6 UJ	0.59 J
Selenium	SEP Step 5	9.8 U	9 U	8.8 U	8.7 U	9.6 U	8.3 U	3.3 J	8.3 U	9.1 U	9 U	9.1 U
Selenium	SEP Step 6	0.66 U	0.6 U	0.59 U	0.58 U	0.64 U	0.55 U	0.59 U	0.56 U	0.61 U	0.6 U	0.61 U
Selenium	SEP Step 7	1.3 U	0.6 U	0.59 U	0.58 U	1.3 U	1.1 U	0.59 U	0.56 U	0.74 J	0.6 U	1.2 U
Selenium	SEP SUM	2.7	0.5 U	0.82	0.75	2.5	0.64	3.3	0.5 U	1.5	0.5 U	0.59
Selenium	SEP TOTAL	1.3 U	1.2 U	0.59 U	0.58 U	1.3 U	1.1 U	1.2 U	0.56 U	0.61 U	0.24 J	1.2 U
Thallium	Total Metal Result	4.5 U	7.2 U	6.9 U	6.8 U	4.1 U	3.7 u	4 U	3.9 U	4.1 U	4.1 U	4.1 U
Thallium	SEP Step 1	9.2 U	8.4 U	8.2 U	8.2 U	8.9 U	7.8 U	8.3 U	7.8 U	8.5 U	8.4 U	8.5 U
Thallium	SEP Step 2	6.9 U	6.3 U	6.2 U	6.1 U	6.7 U	5.8 U	6.2 U	5.8 U	6.4 U	6.3 U	6.4 U
Thallium	SEP Step 3	2.3 U	2.1 U	2.1 U	2 U	2.2 U	1.9 U	2.1 U	1.9 U	2.1 U	2.1 U	2.1 U
Thallium	SEP Step 4	2.3 U	2.1 U	2.1 UJ	2 UJ	2.2 U	1.9 U	2.1 U	1.9 U	2.1 U	2.1 U	2.1 U
Thallium	SEP Step 5	34 UJ	31 UJ	31 UJ	31 UJ	34 UJ	29 UJ	31 UJ	29 UJ	32 UJ	32 UJ	32 UJ
Thallium	SEP Step 6	2.3 U	2.1 U	2.1 U	2 U	2.2 U	1.9 U	2.1 U	1.9 U	2.1 U	2.1 U	2.1 U
Thallium	SEP Step 7	0.48 J	2.1 U	0.62 J	0.56 J	1.1 J	3.9 U	2.1 U	1.9 U	0.97 J	0.74 J	1.3 J
Thallium	SEP SUM	0.48 J	1.8 U	0.62 J	0.56 J	1.4 J	1.8 U	1.8 U	1.8 U	0.97 J	0.74 J	1.3 J
Thallium	SEP TOTAL	0.87 J	4.2 U	0.58 J	0.47 J	0.9 J	3.9 U	4.2 U	1.9 U	0.88 J	0.85 J	1.3 J

Notes:
All results displayed in milligram per kilogram (mg/kg).
ft bgs = feet below ground surface
SEP: Sequential Extraction Procedure
Step 1 - Exchangeable Phase: This extraction includes trace elements that are reversibly adsorbed to soil minerals, amorphous solids, and organic material by electrostatic forces.
Step 2 - Carbonate Phase: This extraction targets trace elements that are adsorbed or otherwise bound to carbonate minerals.
Step 3 - Non-Crystalline Materials Phase: This extraction targets trace elements that are complexed by amorphous minerals (e.g. iron).
Step 4 - Metal Hydroxide Phase: This extraction targets trace elements bound to hydroxides of iron, manganese, and/or aluminum.
Step 5 - Organic Phase: This extraction targets trace elements strongly bound via chemisorption to organic material.
Step 6 - Acid/Sulfide Fraction: The extraction is used to identify trace elements precipitated as sulfide minerals.
Step 7 - Residual Fraction: Trace elements remaining in the soil after the previous extractions will be distributed between silicates, phosphates, and refractory oxides.
U= The analyte was analyzed for, but was not detected above the level of the reported sample quantitation limit.
UJ= The analyte was analyzed for, but was not detected above the level of the reported sample quantitation limit, the quantitation limit is considered estimated.
J= The analyte was positively identified. The associated numerical value is the approximate concentration.
J+= The analyte was positively identified. The associated numerical value is the approximate concentration of the analyte in the sample and biased high.
Total Metal Results are the results of the 6010C analysis

Prepared by: DFSC
Checked by: KMC
Reviewed by: MAH

Table 9: Predicted Range of COI Concentrations in Assessment Wells Assuming Only Dilution and Dispersion
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Constituent	Units	Site-Specific Groundwater Protection Standard[2]	Health-Based Standard	Maximimum concentration observed in Porewater	Maximimum concentration at side-gradient Assessment Wells:				Concentration at Assessment Wells assuming 32%[3] dilution of porewater with maximum concentration measured at:				Concentration at Assessment Wells assuming 63%[4] dilution of porewater with maximum concentration measured at:			
					GAMW-52	GAMW-52B	GAMW-56	GAMW-56B	GAMW-52	GAMW-52B	GAMW-56	GAMW-56B	GAMW-52	GAMW-52B	GAMW-56	GAMW-56B
Arsenic	mg/L	0.091	0.010	0.012	0.0025	0.0016	0.022	0.0025	0.0090	0.0087	0.015	0.0090	0.0060	0.0054	0.018	0.0060
Boron[1]	mg/L	-	4.0	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Cobalt	mg/L	0.010	0.0060	0.0022	0.00058	0.00050	0.0084	0.00050	0.0017	0.0017	0.0042	0.0017	0.0012	0.0011	0.0061	0.0011
Lithium	mg/L	0.040	0.040	0.016	0.0062	0.0071	0.0053	0.0062	0.013	0.013	0.013	0.013	0.0098	0.010	0.0093	0.0098
Molybdenum	mg/L	0.10	0.10	0.81	0.0064	0.015	0.013	0.0064	0.55	0.56	0.55	0.55	0.30	0.31	0.31	0.30
Arsenic	Percentage relative to Groundwater Protection Standard	100%	-	13%	3%	2%	24%	3%	10%	10%	17%	10%	7%	6%	20%	7%
Boron		100%	-	345%	80%	33%	7%	80%	260%	245%	237%	260%	178%	148%	132%	178%
Cobalt		100%	-	22%	6%	5%	84%	5%	17%	17%	42%	17%	12%	11%	61%	11%
Lithium		100%	-	40%	16%	18%	13%	16%	32%	33%	31%	32%	25%	26%	23%	25%
Molybdenum		100%	-	810%	6%	15%	13%	6%	553%	556%	555%	553%	304%	309%	308%	304%

Notes:
(1) Boron does not have a groundwater protection standard, results are compated to the health-based standard
(2) The groundwater protection standard is equal to the higher of the background tolerance limit and the relevant health-based standard
(3) 32% dilution was minimum dilution predicted in Table 8
(4) 63% dilution was maximum dilution predicted in Table 8
ft = feet
mg/L = milligrams per liter

Prepared by GOL
Checked by PJN
Reviewed by RV

Table 10: Sorption Site and Surface Area Calculations
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Units	Minimum	Mean	Maximum
Ferrihydrite				
Amorphous Iron (Step 3 SEP) + Metal Hydroxide Iron (Step 4 SEP)	Sample Name	SB-18B-32/34	Mean of all samples	SB-53B-25-27
	ppm of Fe	1278	2006	3787
	millimoles of Fe	22.9	35.9	67.8
	moles of Fe	0.0229	0.0359	0.0678
Specific Surface Area	m^2/g	600		
Surface Site Concentration	moles weak sites/ mole of Fe	0.2		
Surface Sites	moles of weak sites	0.00458	0.00719	0.01356
Mass of Ferrihydrite	g	2.03	3.19	6.03
Gibbsite				
Amorphous Aluminum (Step 3 SEP) + Metal Hydroxide Aluminum (Step 4 SEP)	Sample Name	SB-53B-30-32	Mean of all samples	OW-9-10-12
	ppm of Al	130	221	408
	millimoles of Al	4.8	8.2	15.1
	moles of Al	0.0048	0.0082	0.0151
Specific Surface Area	m^2/g	32		
Surface Site Concentration	moles weak sites/ mole of Al	0.41		
Surface Sites	moles of weak sites	0.00198	0.00335	0.00619
Mass of Gibbsite	g	0.38	0.64	1.18

Notes:
ppm = parts per million
m^2/g = meters squared per gram
g = grams

Prepared by: GOL
Checked by: PJN
Reviewed by: RV

Figures



LEGEND

- Assessment Monitoring Well
- Background Monitoring Well
- Downgradient Monitoring Well
- Downgradient Boring Location
- Porewater Sample Location
- CCR Source Material Sample Location
- Generalized Groundwater Flow Direction
- CCR Units
- Approximate Property Line

0 850 1,700

1" = 850 feet

NOTE(S)

1. THIS FIGURE DEPICTS THE GENERALIZED GROUNDWATER FLOW DIRECTION WITHIN THE UPPER PORTION OF THE SURFICIAL AQUIFER.

REFERENCE(S)

1. SERVICE LAYER CREDITS: SOURCES: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRID, IGN, AND THE GIS USER COMMUNITY

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

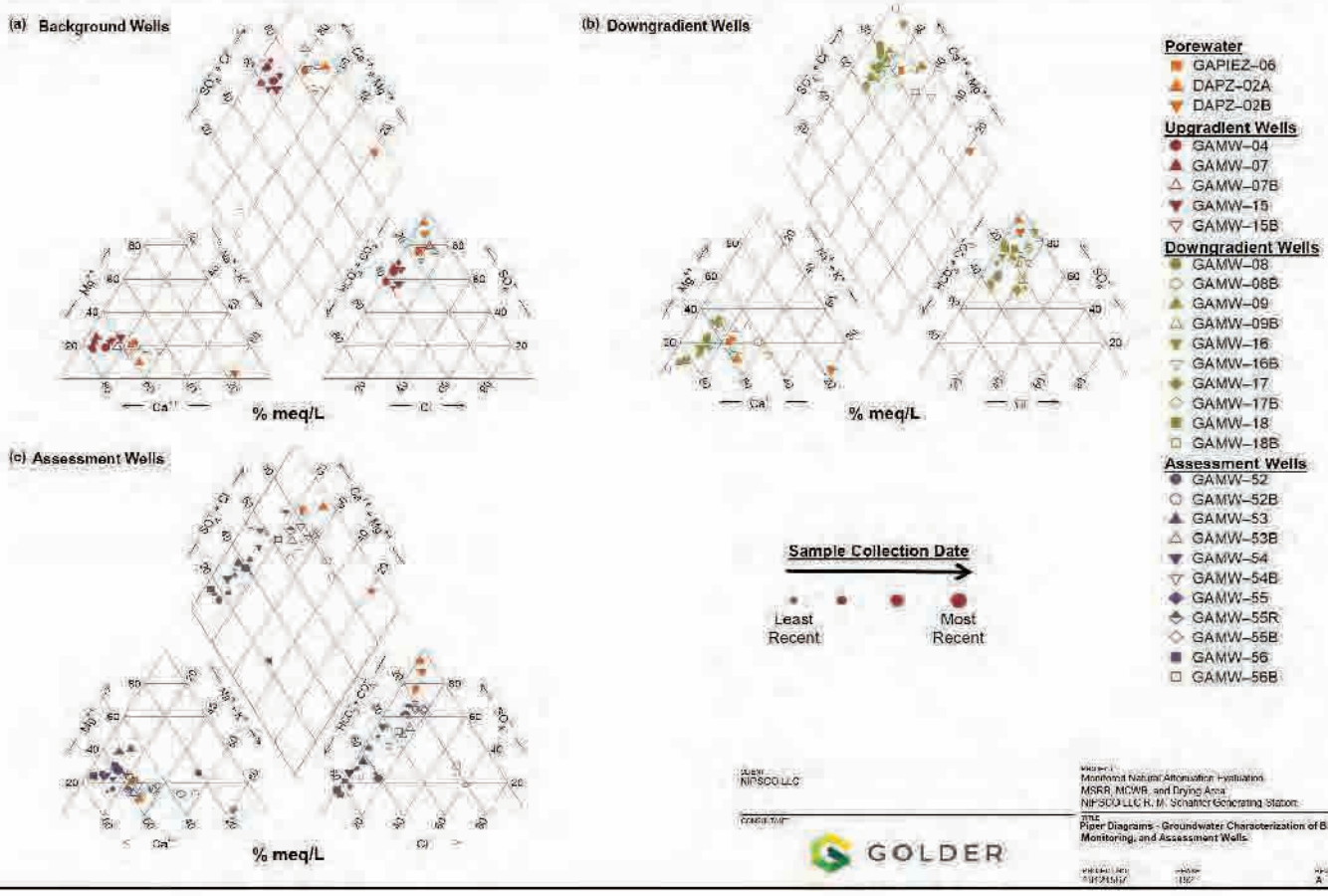
MONITORED NATURAL ATTENUATION EVALUATION
MSRD, MCWD, AND DRYING AREA
MICHIGAN CITY (R. M. SCHAHFER) GENERATING STATION

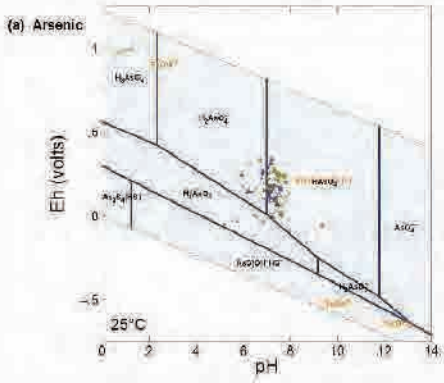
SAMPLE LOCATION MAP

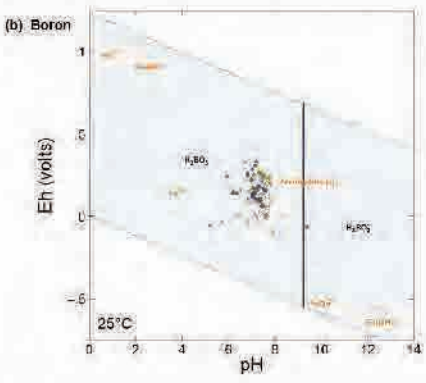
GOLDER

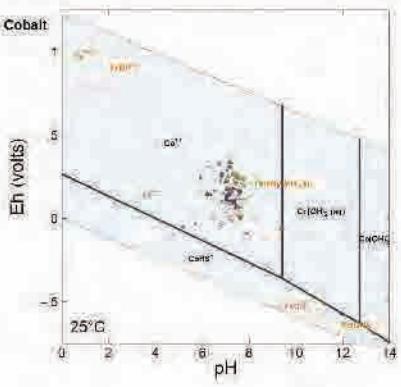
DESIGNED	DFS
APPROVED	MWH

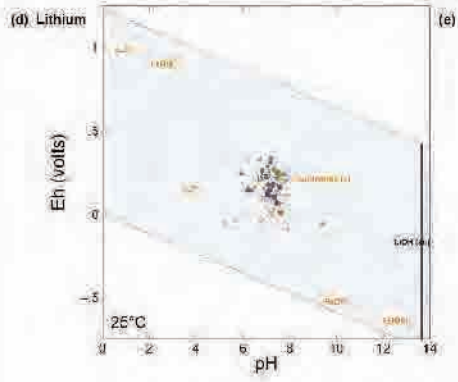
PROJECT NO. 19101587 | CONTROL A | REV. 0 | FIGURE 1

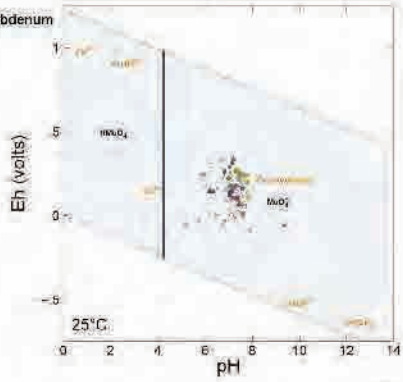

(a) Background Wells
(b) Downgradient Wells
(c) Assessment Wells
% meq/L
Porewater
GAPIEZ-06
DAPZ-02A
DAPZ-02B
Upgradient Wells
GAMW-04
GAMW-07
GAMW-07B
GAMW-15
GAMW-15B
Downgradient Wells
GAMW-08
GAMW-08B
GAMW-09
GAMW-09B
GAMW-16
GAMW-16B
GAMW-17
GAMW-17B
GAMW-18
GAMW-18B
Assessment Wells
GAMW-52
GAMW-52B
GAMW-53
GAMW-53B
GAMW-54
GAMW-54B
GAMW-55
GAMW-55R
GAMW-55B
GAMW-56
GAMW-56B
Sample Collection Date
Least Recent
Most Recent
NIPSCO LLC
GOLDER
Monitored Natural Attenuation Evaluation
MSRR, MCWR, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station
Piper Diagrams - Groundwater Characterization of Background, Monitoring, and Assessment Wells
A
2a-c











Porewater
- GAPIEZ–06
- DAPZ–02A
- DAPZ–02B

Upgradient Wells
- GAMW–04
- GAMW–07
- GAMW–07B
- GAMW–15
- GAMW–15B

Downgradient Wells
- GAMW–08
- GAMW–08B
- GAMW–09
- GAMW–09B
- GAMW–16
- GAMW–16B
- GAMW–17
- GAMW–17B
- GAMW–18
- GAMW–18B

Assessment Wells
- GAMW–52
- GAMW–52B
- GAMW–53
- GAMW–53B
- GAMW–54
- GAMW–54B
- GAMW–55
- GAMW–55R
- GAMW–55B
- GAMW–56
- GAMW–56B

Sample Collection Date

Least Recent → Most Recent

CLIENT
NRG/SCO LLC

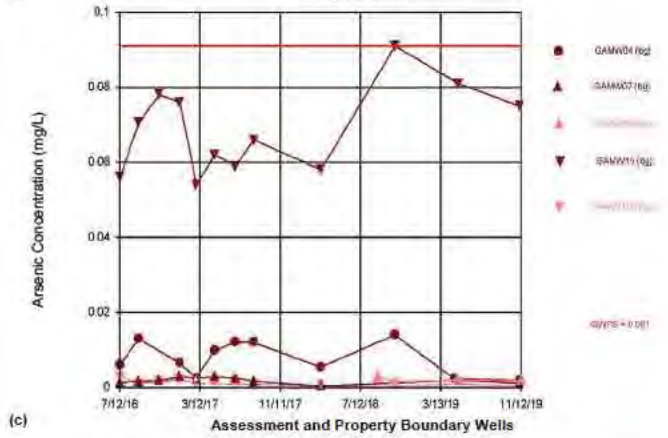
PROJECT
Monitored Natural Attenuation Evaluation
MGWR, MGWR, and Drying Area
NRG/SCO LLC/T.H. Schaefer Generating Station

TITLE
Pourbaix Diagrams For Arsenic, Boron, Cobalt, Lithium, and Molybdenum

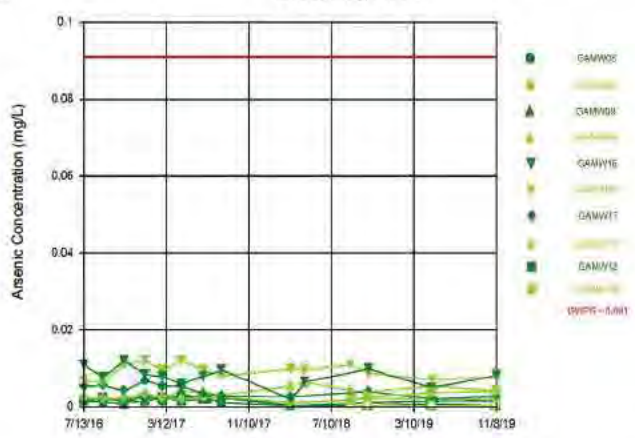
GOLDER

PROJECT NO. 1912165 | REV. 0 | FIG. A | 3a-e

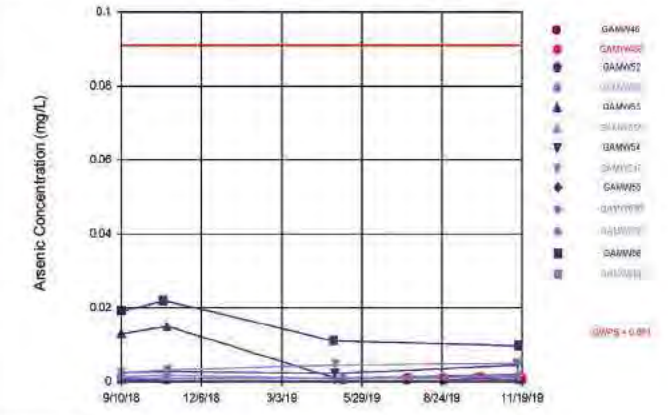
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit.

CLIENT
NIPSCO LLC

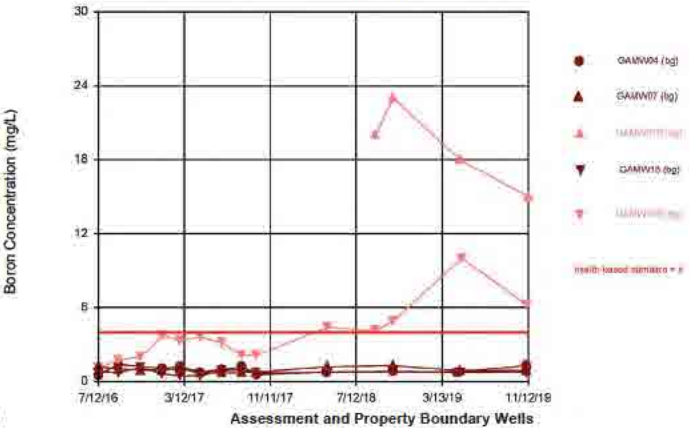
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

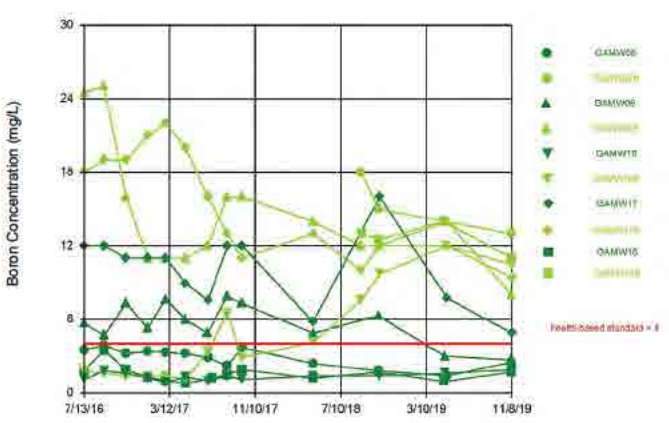
TITLE
Arsenic Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	4a-c

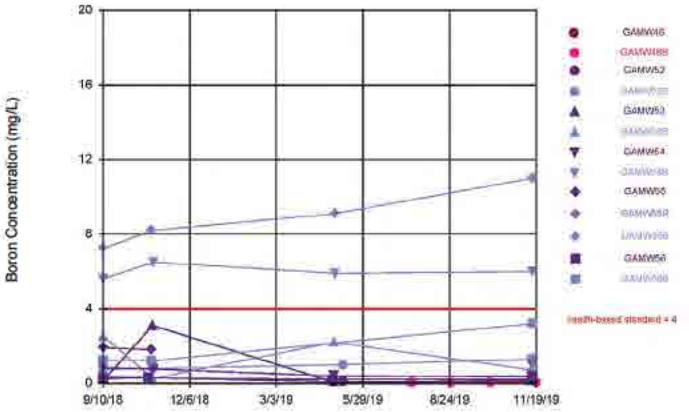
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

CLIENT
NIPSCO LLC

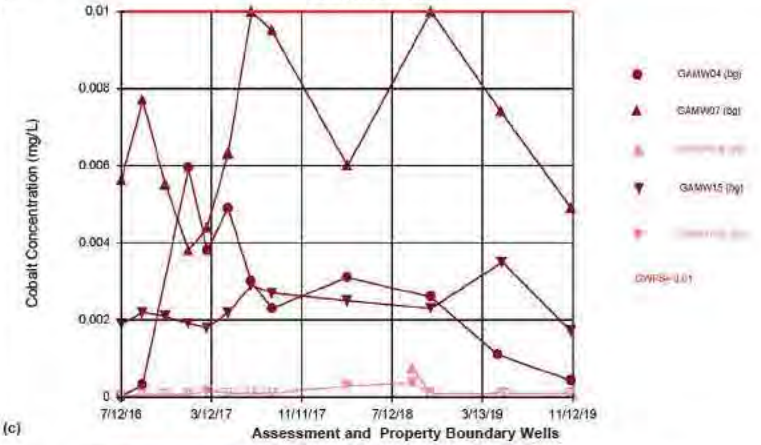
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

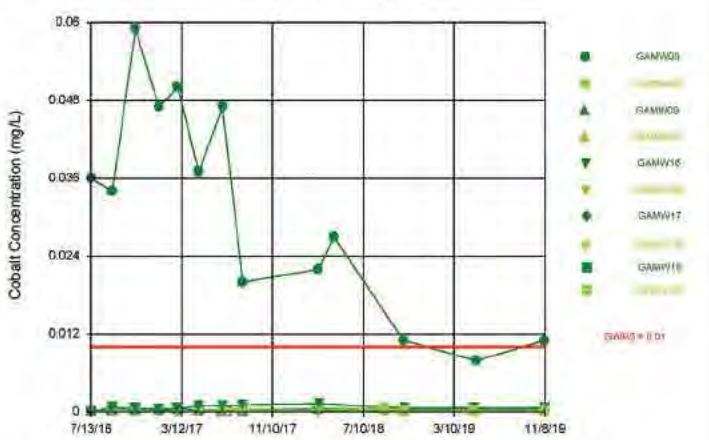
TITLE
Boron Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	5a-c

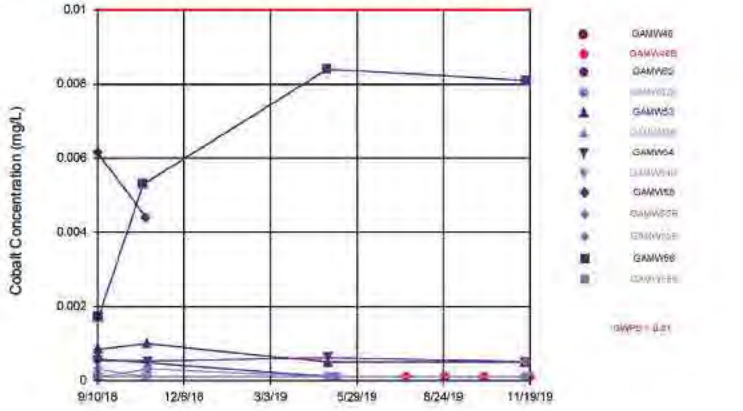
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

CLIENT
NIPSCO LLC

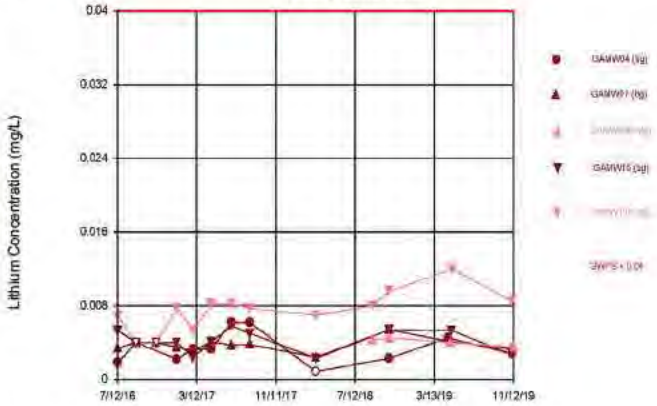
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

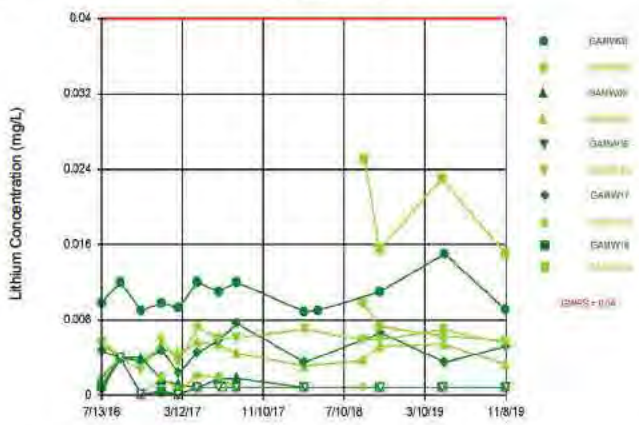
TITLE
Cobalt Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	152	A	6a-c

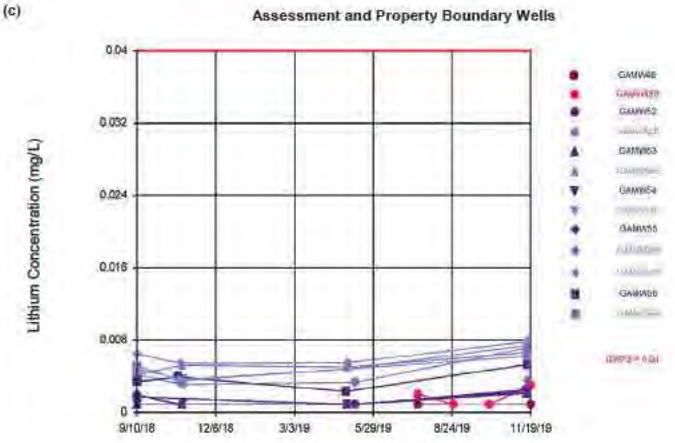
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

CLIENT
NIPSCO LLC

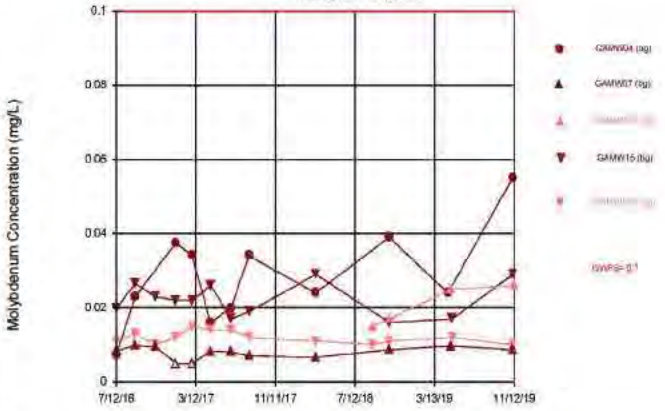
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

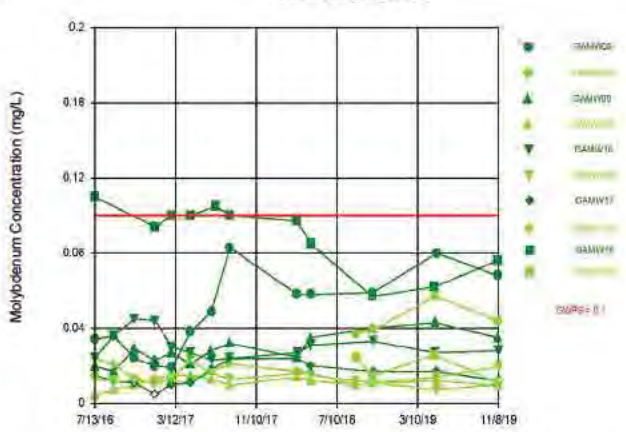
TITLE
Lithium Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	7a-c

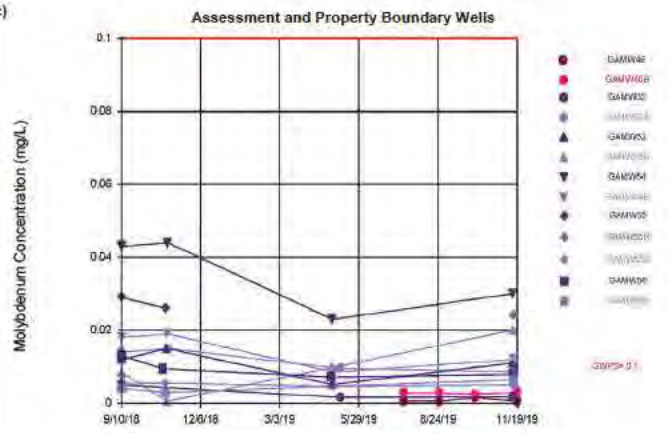
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

CLIENT
NIPSCO LLC

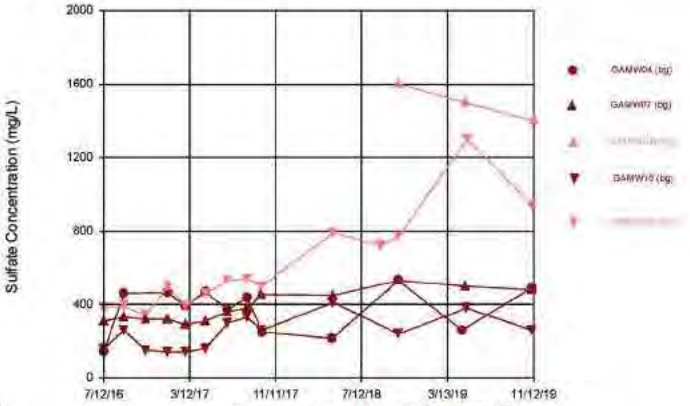
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

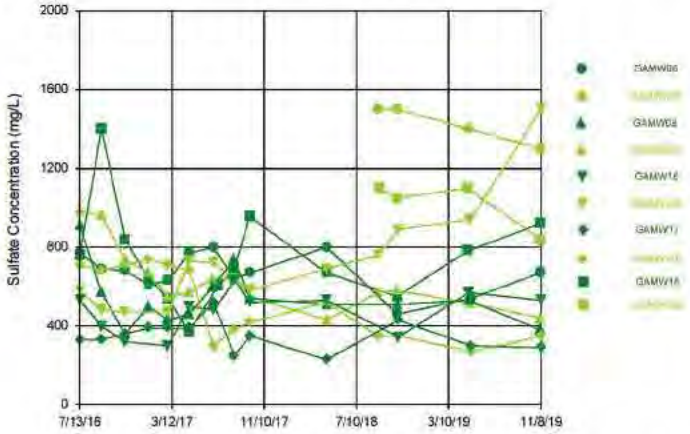
TITLE
Molybdenum Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	8a-c

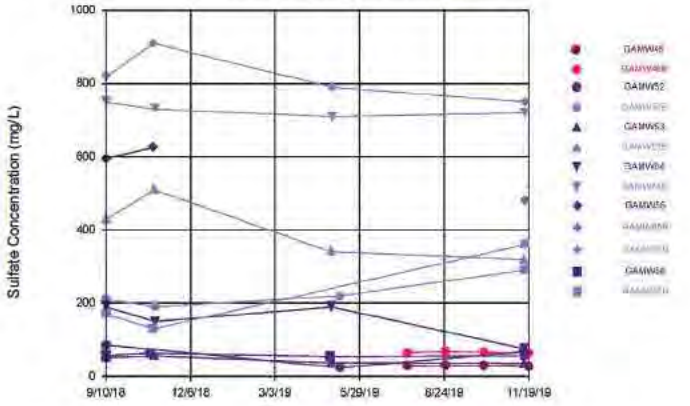
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

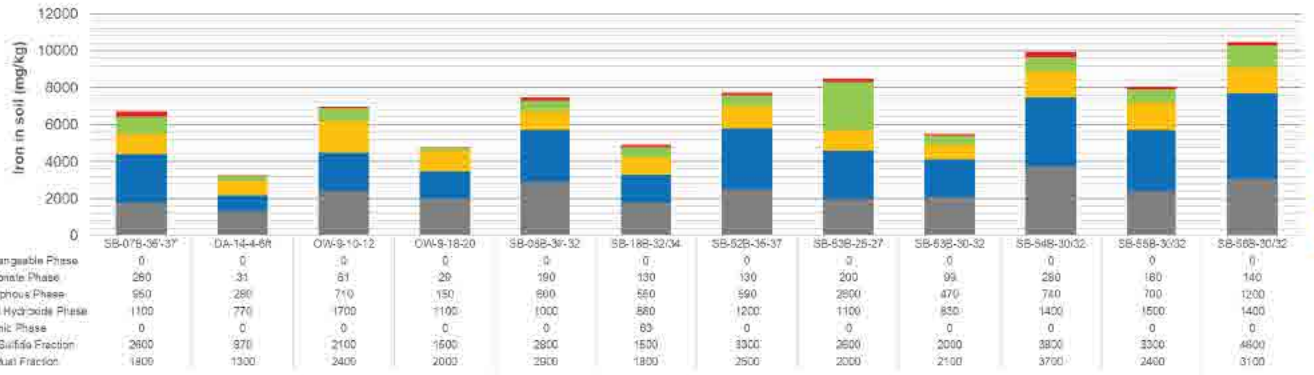
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

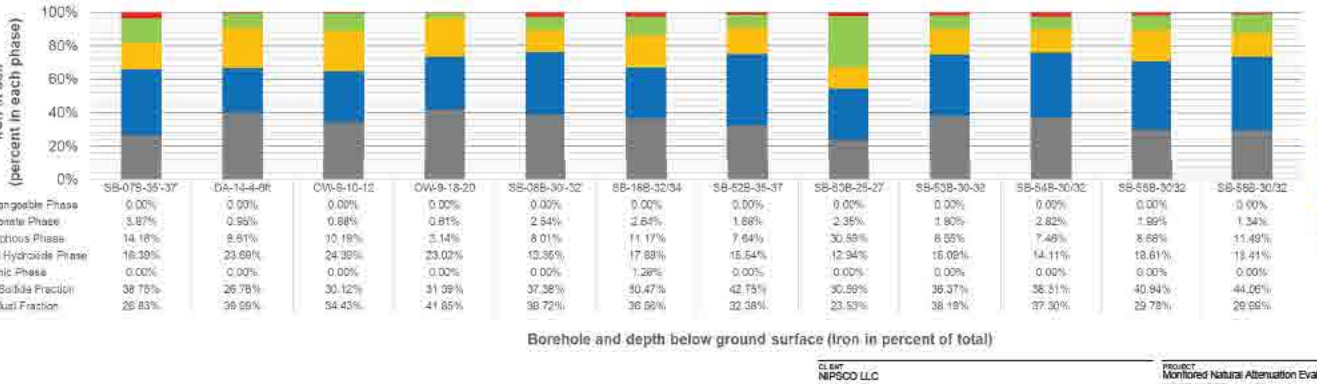
TITLE
Sulfate Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	9a-c



	SB-07B-35'-37'	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30'-32	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-56B-30/32
Exchangeable Phase	0	0	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	260	31	61	29	190	130	130	200	99	280	180	140
Amorphous Phase	950	280	710	150	660	550	590	2800	470	740	700	1200
Metal Hydroxide Phase	1100	770	1700	1100	1000	880	1200	1100	850	1400	1500	1400
Organic Phase	0	0	0	0	0	63	0	0	0	0	0	0
Acid/Sulfide Fraction	2600	970	2100	1500	2800	1500	3300	2600	2000	3800	3300	4600
Residual Fraction	1800	1300	2400	2000	2900	1800	2500	2000	2100	3700	2400	3100

Borehole and depth below ground surface (Iron in mg/kg soil)



	SB-07B-35'-37'	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30'-32	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-56B-30/32
Exchangeable Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	3.87%	0.95%	0.88%	0.61%	2.54%	2.64%	1.68%	2.35%	1.80%	2.82%	1.99%	1.34%
Amorphous Phase	14.16%	8.61%	10.19%	3.14%	8.81%	11.17%	7.64%	32.89%	8.55%	7.46%	8.68%	11.49%
Metal Hydroxide Phase	16.39%	23.69%	24.39%	23.02%	13.36%	17.88%	15.54%	12.94%	15.09%	14.11%	18.61%	13.41%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	1.28%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Acid/Sulfide Fraction	38.75%	29.78%	30.12%	31.39%	37.38%	30.47%	42.75%	30.59%	36.37%	36.51%	40.94%	44.06%
Residual Fraction	26.83%	39.99%	34.43%	41.85%	38.72%	36.56%	32.38%	23.53%	38.19%	37.30%	29.79%	29.69%

Borehole and depth below ground surface (Iron in percent of total)

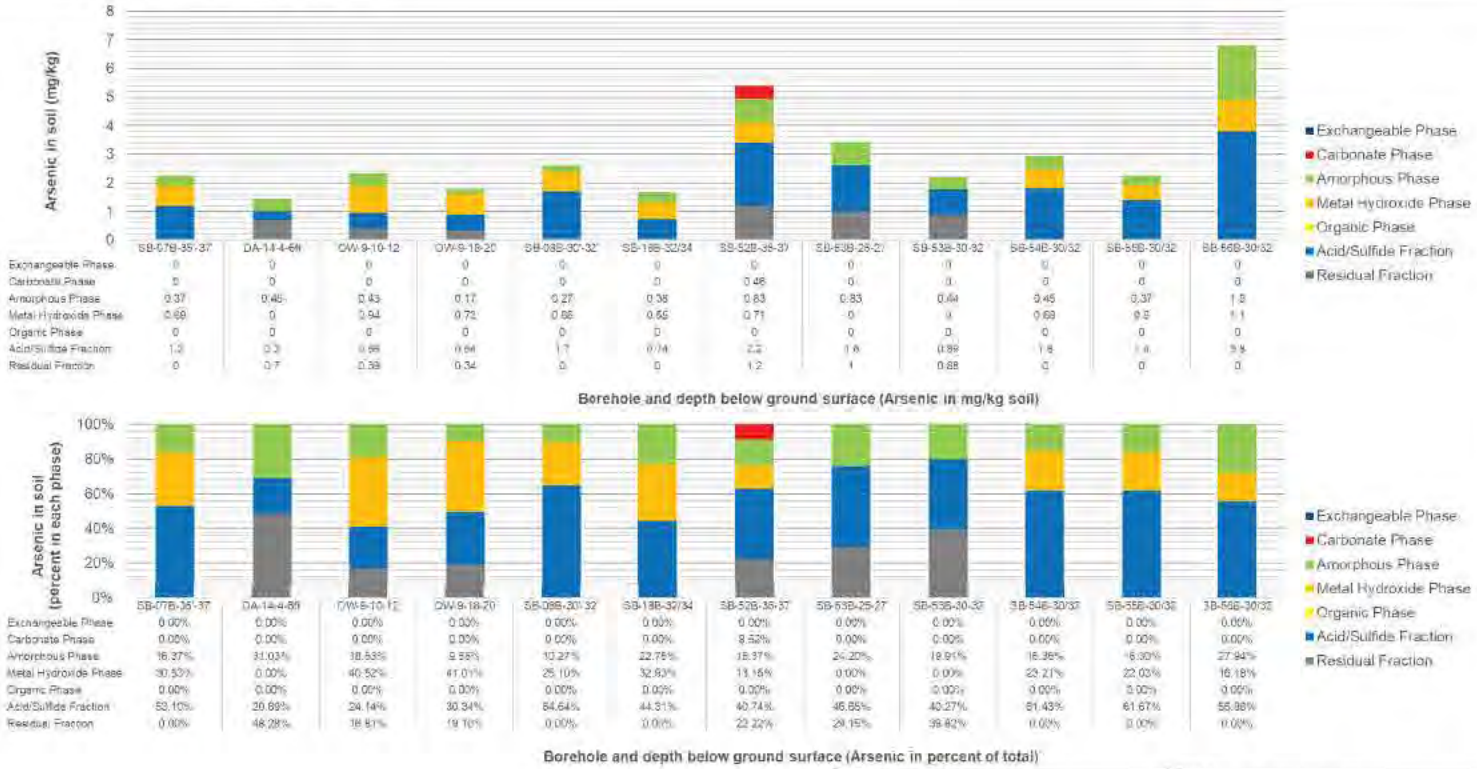
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

TITLE
Iron Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	10



	SB-07B-35/37	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30/32	SB-18B-32/34	SB-52B-35/37	SB-53B-25/27	SB-53B-30/32	SB-54B-30/32	SB-55B-30/32	SB-56B-30/32
Exchangeable Phase	0	0	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	0	0	0	0	0	0	0.46	0	0	0	0	0
Amorphous Phase	0.37	0.46	0.43	0.17	0.27	0.38	0.83	0.83	0.64	0.45	0.37	1.9
Metal Hydroxide Phase	0.69	0	0.94	0.72	0.66	0.55	0.71	0	0	0.69	0.5	1.1
Organic Phase	0	0	0	0	0	0	0	0	0	0	0	0
Acid/Sulfide Fraction	1.2	0.3	0.88	0.84	1.7	0.74	2.2	1.6	0.89	1.8	1.4	3.5
Residual Fraction	0	0.7	0.39	0.34	0	0	1.2	1	0.88	0	0	0

Borehole and depth below ground surface (Arsenic in mg/kg soil)

	SB-07B-35/37	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30/32	SB-18B-32/34	SB-52B-35/37	SB-53B-25/27	SB-53B-30/32	SB-54B-30/32	SB-55B-30/32	SB-56B-30/32
Exchangeable Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	8.52%	0.00%	0.00%	0.00%	0.00%	0.00%
Amorphous Phase	16.37%	31.03%	18.53%	9.55%	10.27%	22.75%	15.37%	24.20%	19.91%	16.36%	16.30%	27.94%
Metal Hydroxide Phase	30.53%	0.00%	40.52%	41.01%	25.10%	32.93%	13.15%	0.00%	0.00%	25.21%	22.03%	16.18%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Acid/Sulfide Fraction	53.10%	20.69%	24.14%	30.34%	64.64%	44.31%	40.74%	46.65%	40.27%	61.43%	61.67%	55.88%
Residual Fraction	0.00%	48.28%	16.81%	19.10%	0.00%	0.00%	22.22%	29.15%	39.82%	0.00%	0.00%	0.00%

Borehole and depth below ground surface (Arsenic in percent of total)

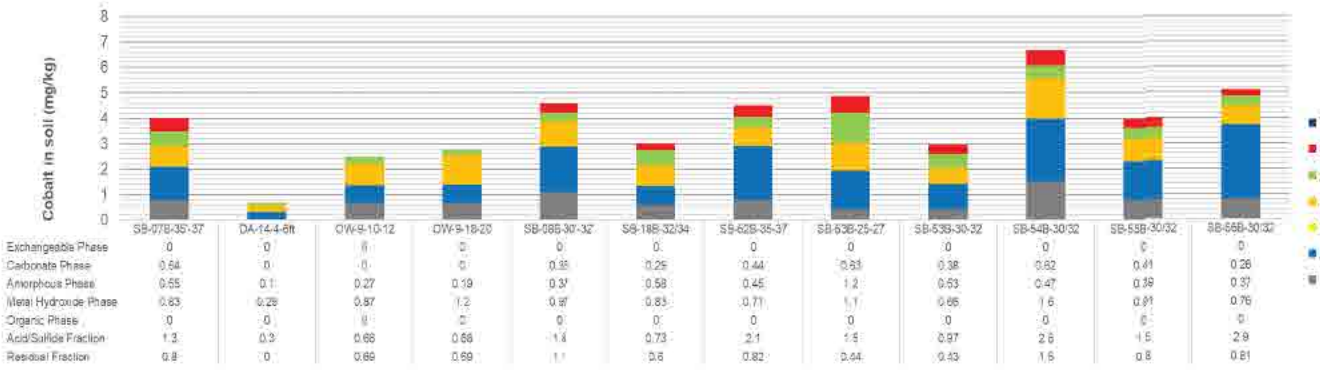
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

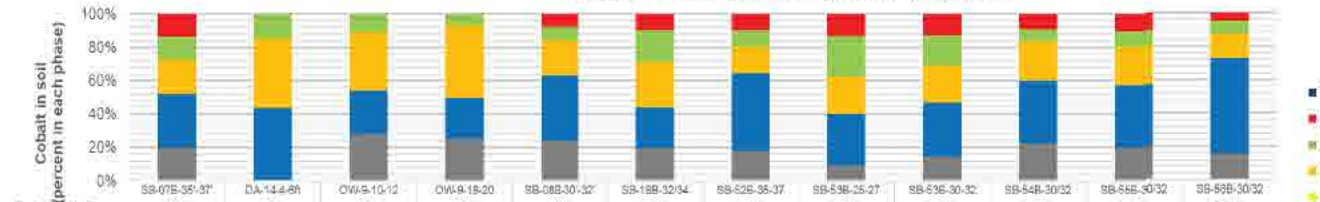
TITLE
Arsenic Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	152	A	11



	SB-07B-35'-37'	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30'-32'	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-55B-30/32
Exchangeable Phase	0	0	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	0.64	0	0	0	0.33	0.25	0.44	0.83	0.38	0.62	0.41	0.26
Amorphous Phase	0.55	0.1	0.27	0.19	0.3'	0.58	0.45	1.2	0.53	0.47	0.39	0.37
Metal Hydroxide Phase	0.83	0.29	0.87	1.2	0.9'	0.83	0.71	1.1	0.66	1.6	0.91	0.76
Organic Phase	0	0	0	0	0	0	0	0	0	0	0	0
Acid/Sulfide Fraction	1.3	0.3	0.68	0.56	1.4	0.73	2.1	1.5	0.97	2.6	1.5	2.9
Residual Fraction	0.8	0	0.69	0.69	1.1	0.6	0.82	0.64	0.43	1.6	0.8	0.81

Borehole and depth below ground surface (Cobalt in mg/kg soil)



	SB-07B-35'-37'	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30'-32'	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-55B-30/32
Exchangeable Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	13.43%	0.00%	0.00%	0.00%	7.65%	9.57%	9.75%	12.94%	12.79%	9.27%	10.22%	6.10%
Amorphous Phase	13.68%	14.49%	10.84%	6.88%	8.06%	19.14%	9.96%	24.64%	17.85%	7.03%	9.73%	7.25%
Metal Hydroxide Phase	20.85%	42.03%	34.94%	43.48%	21.13%	27.39%	15.71%	22.59%	22.22%	23.92%	22.69%	14.90%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Acid/Sulfide Fraction	32.34%	43.48%	26.51%	24.64%	39.22%	24.09%	46.48%	30.80%	32.66%	37.37%	37.41%	56.86%
Residual Fraction	19.90%	0.00%	27.71%	25.00%	23.97%	18.80%	18.14%	9.03%	14.48%	22.42%	19.95%	15.88%

Borehole and depth below ground surface (Cobalt in percent of total)

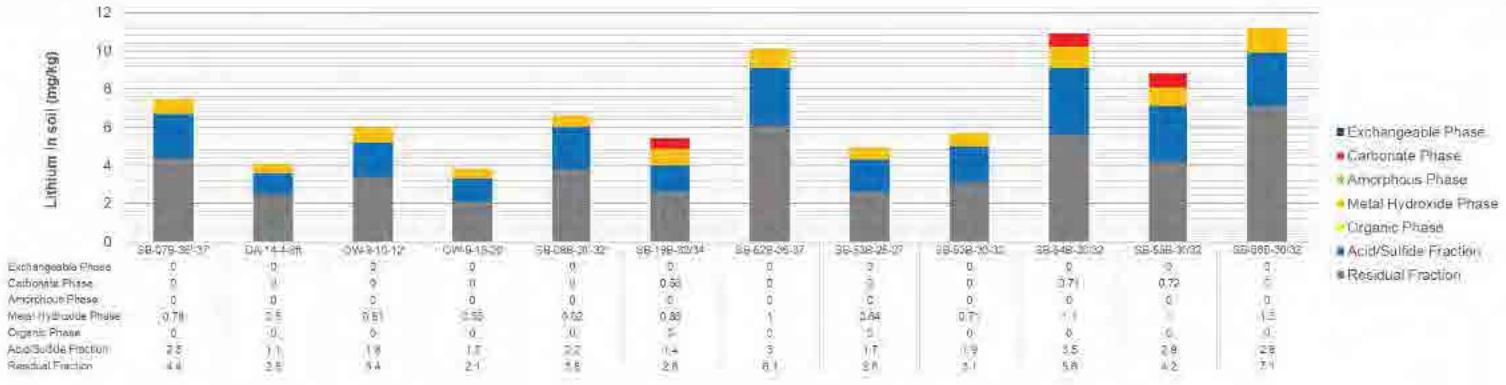
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

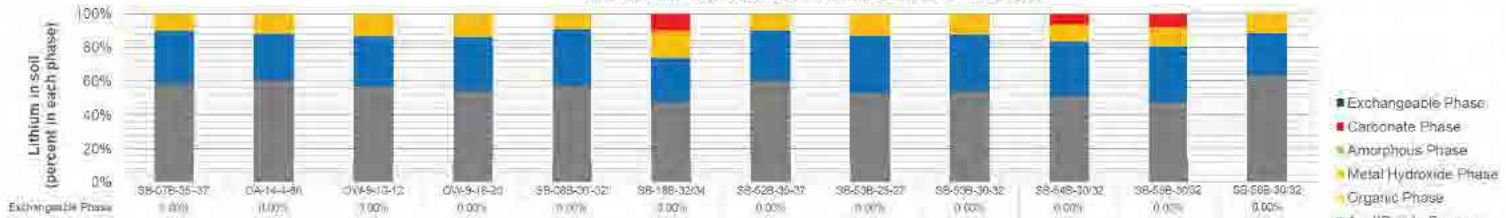
TITLE
Cobalt Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	12



	SB-07B-35-37	DA-14-4-6ft	OW9-10-12	OW9-18-20	SB-08B-30-32	SB-19B-32/34	SB-62B-35-37	SB-53B-25-27	SB-53B-30-32	SB-64B-30/32	SB-59B-30/32	SB-66B-30/32
Exchangeable Phase	0	0	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	0	0	0	0	0	0.56	0	0	0	0.71	0.72	0
Amorphous Phase	0	0	0	0	0	0	0	0	0	0	0	0
Metal Hydroxide Phase	0.78	0.5	0.51	0.55	0.52	0.89	1	0.84	0.71	1.1	1	1.3
Organic Phase	0	0	0	0	0	0	0	0	0	0	0	0
Acid/Sulfide Fraction	2.8	1.1	1.8	1.5	2.2	1.4	3	1.7	1.9	3.5	2.8	2.8
Residual Fraction	4.4	2.5	3.4	2.1	3.8	2.8	6.1	2.8	3.1	5.8	4.2	7.1

Borehole and depth below ground surface (Lithium in mg/kg soil)



	SB-07B-35-37	DA-14-4-6ft	OW9-10-12	OW9-18-20	SB-08B-30-32	SB-19B-32/34	SB-62B-35-37	SB-53B-25-27	SB-53B-30-32	SB-64B-30/32	SB-59B-30/32	SB-66B-30/32
Exchangeable Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	0.00%	0.00%	0.00%	0.00%	0.00%	10.33%	0.00%	0.00%	0.00%	6.51%	8.16%	0.00%
Amorphous Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Metal Hydroxide Phase	10.43%	12.20%	13.48%	14.29%	9.37%	16.67%	9.90%	12.86%	12.43%	10.09%	11.34%	11.61%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Acid/Sulfide Fraction	38.75%	26.83%	26.25%	31.17%	32.23%	25.83%	29.70%	34.41%	33.21%	32.08%	32.68%	25.00%
Residual Fraction	58.82%	60.98%	56.67%	54.55%	57.40%	47.07%	60.40%	52.63%	54.29%	51.33%	47.02%	63.39%

Borehole and depth below ground surface (Lithium in percent of total)

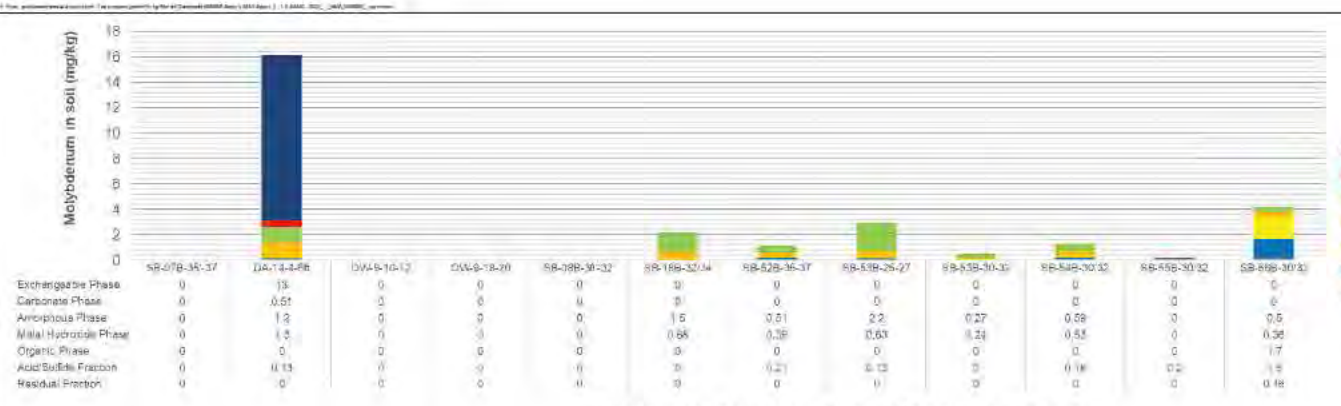
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

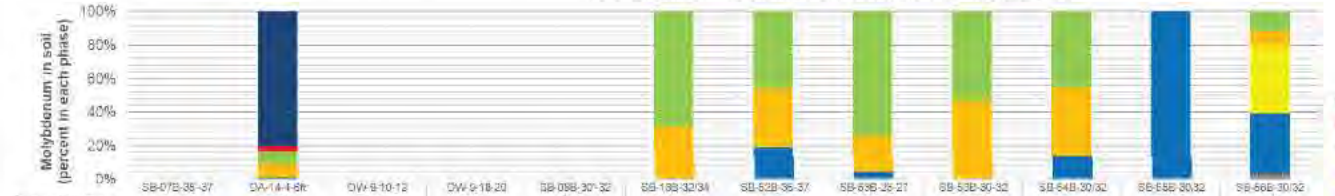
TITLE
Lithium Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	152	A	13



	SB-07B-35-37	DA-14-4-5R	OW-9-10-12	OW-9-18-20	SB-09B-30-32	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-66B-30/32
Exchangeable Phase	0	13	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	0	0.51	0	0	0	0	0	0	0	0	0	0
Amorphous Phase	0	1.2	0	0	0	1.5	0.51	2.2	0.27	0.69	0	0.5
Metal Hydroxide Phase	0	1.5	0	0	0	0.68	0.39	0.63	0.24	0.53	0	0.36
Organic Phase	0	0	0	0	0	0	0	0	0	0	0	1.7
Acid/Sulfide Fraction	0	0.13	0	0	0	0	0.21	0.13	0	0.19	0.2	1.5
Residual Fraction	0	0	0	0	0	0	0	0	0	0	0	0.18

Borehole and depth below ground surface (Molybdenum in mg/kg soil)



	SB-07B-35-37	DA-14-4-5R	OW-9-10-12	OW-9-18-20	SB-09B-30-32	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-66B-30/32
Exchangeable Phase	0.00%	80.66%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	0.00%	3.16%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Amorphous Phase	0.00%	7.43%	0.00%	0.00%	0.00%	68.81%	45.95%	74.32%	52.94%	45.39%	0.00%	11.65%
Metal Hydroxide Phase	0.00%	9.05%	0.00%	0.00%	0.00%	31.19%	35.14%	21.28%	47.06%	46.77%	0.00%	8.53%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	40.28%
Acid/Sulfide Fraction	0.00%	0.81%	0.00%	0.00%	0.00%	0.00%	18.92%	4.39%	0.00%	13.85%	100.00%	35.55%
Residual Fraction	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.79%

Borehole and depth below ground surface (Molybdenum in percent of total)

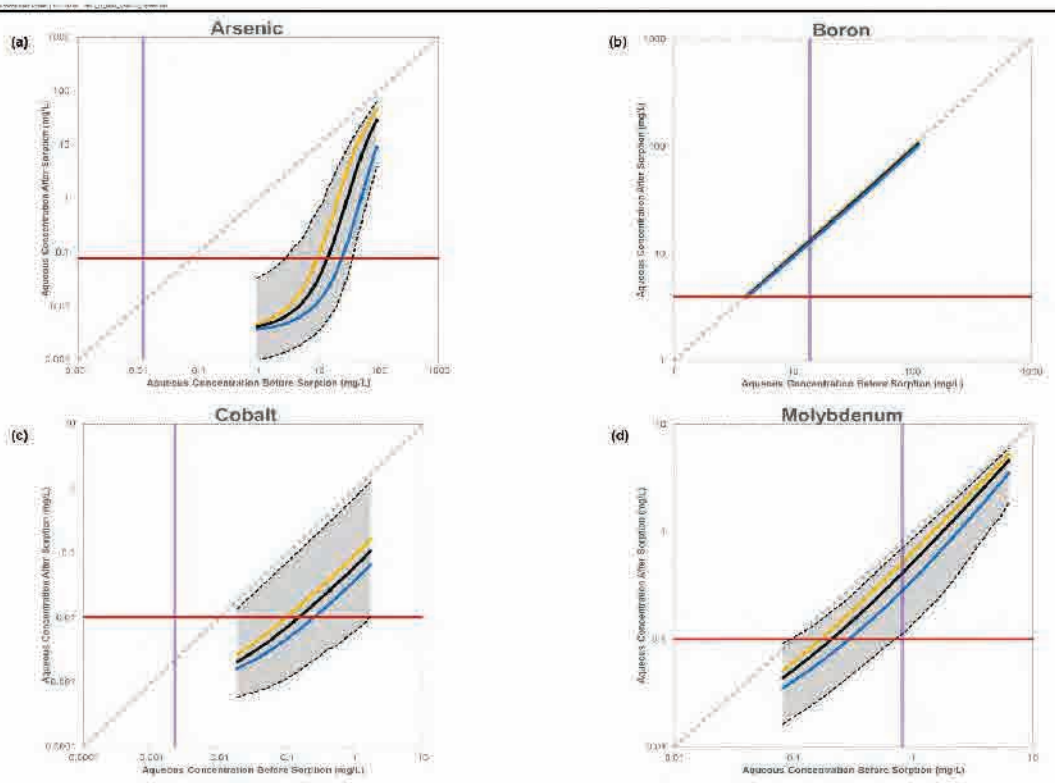
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

TITLE
Molybdenum Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	152	A	14



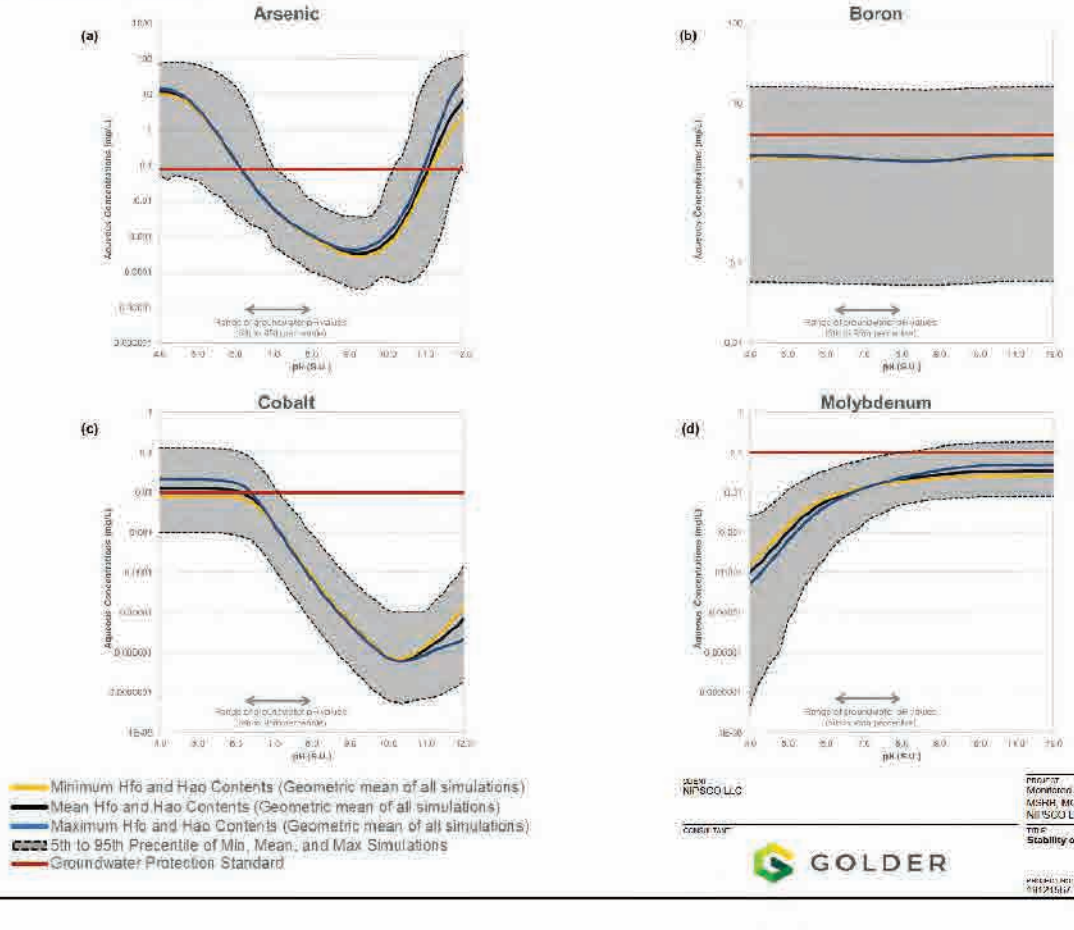
CLIENT
NRGCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSHH, MCWH, and Laying Area
NRGCO LLC R. M. Schahfer Generating Station

TITLE
Capacity of Soils to Adsorb Constituents: Aqueous Concentrations Prior to Equilibrating with Hfo and Hao versus Aqueous Concentrations After Equilibrating

PROJECT NO. 19121557 | PHASE 150 | REV. A | FIGURE 15



CLIENT
NRGCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSWF, IMCWF, and Laying Area
NRGCO LLC/ R. M. Schahfer Generating Station

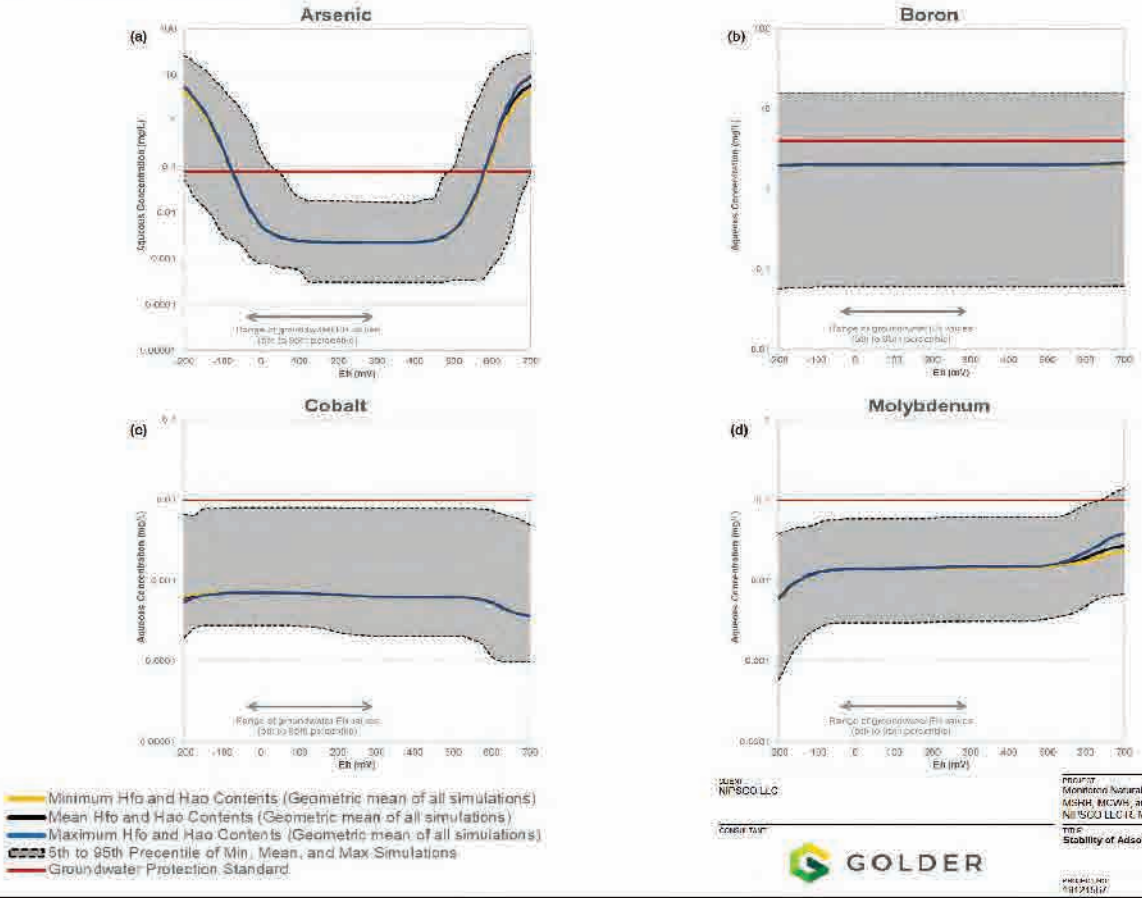
TITLE
Stability of Adsorbed Constituents Versus pH

PROJECT NO.
19121567

PHASE
100

REV.
A

FIGURE
16



CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSWF, IMCWF, and Haying Area
NIPSCO LLC R. M. Schahfer Generating Station

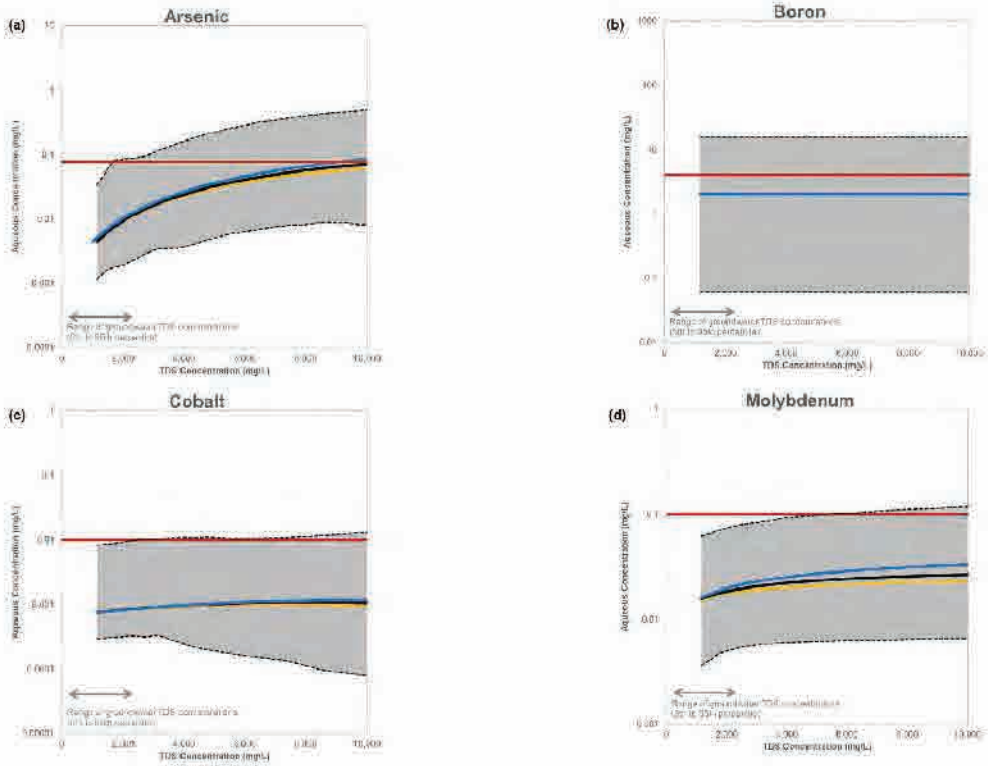
TITLE
Stability of Adsorbed Constituents Versus Eh

PROJECT NO.
19125507

PHASE
150

REV.
A

FIGURE
17



CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSWF, MCWF, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

TITLE
Stability of Adsorbed Constituents Versus TDS

PROJECT NO.
19121560

PHASE
150

REV.
A

FIGURE
18

APPENDIX A

Groundwater and Porewater Monitoring Data

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW04																
Sample Date		2016-07-12	2016-09-08	2016-11-09	2017-01-10		2017-03-01	2017-04-26	2017-06-28	2017-08-22	2017-10-04	2018-03-13		2018-04-20		2018-10-25	2019-04-23	2019-11-07
Samp e Type		N	N	N	FD	N	N	N	N	N	N	FD	N	FD	N	N	N	N
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	0.48	1.4	2.4	1.1	1	1.2	0.74	0.92	1.2	0.54			0.74	0.72	0.78	0.74	1 3
Ca cium	mg/L	110	230	300	270	240	230	220	200	200	140			140	140	210	130	190
Ch oride	mg/L	2.2	27	69	13	14	13	5.4	12	13	4.5			3.7 J	4.4	10	3.7	9 5
Fluoride	mg/L	0.92 J	0 2 J	10 U	0.19 J	0.17 J	5 U	5 U	0.19 J	0.21 J	0.24 J	0.15 J	5 U	5 U	0.17 J-	0.26	0.16 J	0.23
pH	SU	7.22	6.83	6.75		6.93	7 01	6.76	6.88	7.21	7.28		6.95		7 2	6.39	7	7.14
Su fate	mg/L	140 J-	460	480	460	470	390	470	370	440	250			220	210	530	260	490
Total Dissolved Solids	mg/L	420	990	1400	1000	1000	890	870	880	920	610			580 J	580	980	600	900
CCR Appendix IV																		
Ant mony	mg/L	0.002 U	0.002 U	0.00027 J	0.002 U	0.00057 J	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U	0.002 U			0.002 U	0.00065 J	0.00092 J
Arsenic	mg/L	0 0059	0.013	0.0052	0.0058	0.0072	0.005 U	0.0099	0.012	0.012		0.004 J	0.0054			0.014	0.0023 J	0.0018 J
Barium	mg/L	0.041	0.077	0.11	0.095	0.079	0.089	0.069	0.084	0.09		0.11	0.077			0.074	0.068	0.066
Beryllium	mg/L	0 00027 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.00048 J	0.00053 J	0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.00036 J	0.00036 J	0.0052 J	0.002 U	0.002 U	0.002 U	0.002 U		0.0011 J	0.0012 J			0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.00031 J	0.00064 J	0.0061	0.0058	0.0038	0.0049	0.003	0.0023		0.0028	0.0031			0.0026	0.0011	0.00043 J
Fluoride	mg/L	0.92 J	0 2 J	10 U	0.19 J	0.17 J	5 U	5 U	0.19 J	0.21 J	0.24 J	0.15 J	5 U	5 U	0.17 J-	0.26	0.16 J	0.23
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0018 J	0.008 U	0.008 U	0.0021 J	0.0023 J	0.0033 J	0.0033 J	0.0062 J	0.0062 J		0.008 U	0 008 U			0.0023 J	0.0045 J	0.0028 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U	0.0002 U			0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0075 J	0.023	0.073	0.037	0.038	0.034	0.016	0 02	0.034		0.0048 J	0.024			0.039	0.024	0.055
Radium Total	pci/L	5 U	0.583	0.697	0.804	0.515 U	0.362 U	0.379 U	0.364 U	0.352 U		1.35 J	0.778 J			0.473	0.591	
Radium-226	pci/L	1 U	0.138 U	0.346 U	0.301 U	0.242 U	0.121 U	0.117 U	0.119 J	0.118		0.177	0.0881			0.306	0.311 U	
Radium-228	pci/L	1 U	0.498 U	0.495 U	0.677 J	0.515 U	0.362 U	0.379 U	0.364 U	0.352 U		1.17 J	0.69 J			0.462 U	0.405	
Selenium	mg/L	0.005 U	0.005 U	0.00064 J	0.0017 J	0.0021 J	0.005 U	0.005 U	0.005 U	0.005 U		0.001 J	0.001 J			0.005 U	0.0013 J	0.0052
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L																	
Alkal nity Carbonate (CO3)	mg/L																	
Alkal nity Hydrox de (OH)	mg/L																	
Alkal nity Total	mg/L															230	190	270
Ferr c Iron	mg/L															6.9		
Ferrous Iron	mg/L															3.1 J		
Iron	mg/L																2.3	0.083 J
Magnesium	mg/L															31	18	31
Manganese	mg/L																0.012 J-	0.0078 J
Nitrate as N	mg/L																0.1 U	0.1 U
Nitrite as N	mg/L																	
Nitrogen Nitrate-Nitrite	mg/L															0.39		
Phosphorus (as phosphate)	mg/L															0.9	0.31 U	0.31 UJ
Potassium	mg/L															3.3 J	3.1 J	3.2 J
Sodium	mg/L															13	12	36
Sample Parameters																		
Dissolved Oxygen	mg/L	0.09	0.58	0.37		1.82	1.47	0.12	0.3	0.52	0.09		0.66		2 3	0.15	7.08	2.55
Oxidation Reduction Potent al	mV	59.6	-24	-6.9		-31.7	14	-57.8	-45	-27	-105.8		-181.8		-81 2	-58.1	19	-60.7
Eh	mV	259.6	176.0	193.1		168.3	214.0	142.2	155.0	173.0	94.2		18.2		118.8	141.9	219.0	139.3
pH	SU	7.22	6.83	6.75		6.93	7.01	6.76	6.88	7.21	7.28		6.95		7 2	6.39	7	7.14
Spec f c Conductance	uS/cm	595	1345	1681		1109	910	1137	911	1153	813		562		770	1311	549	866
Temperature	deg C	13	17.3	16.3		10.5	8 05	10.2	13.1	15.9	16.1		7.55		3 5	15.5	4.2	13.2
Turb dity	NTU	4.04	1.48	2.21		2.28	4 26	4 04	4.88	1.65	0.51		4.92		3.12	1.92	4.48	1.38

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW07															GAMW07B			
Sample Date		2016-07-12	2016-09-08	2016-11-09	2017-01-10	2017-03-01	2017-04-26	2017-06-29	2017-08-23	2017-10-03		2018-03-15	2018-04-23	2018-10-26	2019-05-02	2019-11-08	2018-09-06	2018-10-26	2019-05-02	2019-11-12
Samp e Type		N	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	N	N	N	N
Chemical Name	Un t																			
CCR Appendix I I I																				
Boron	mg/L	1.2	1	0.91	0.91	1	0.68	0.67	0.68	0.71	0.72		1.2	1.3	0.85	0.85	20	23	18	15
Ca cium	mg/L	170	190	200	170	170	190	220	190	220	220		210	230	220	180	370	430	380	400
Ch oride	mg/L	7.8	6.6	5.3	6	7 6	2.8	3 J	3.2 J	3 J	3 6 J		4.7 J	6 3	6 5	4.8	10 U	250	170	150
Fluoride	mg/L	0.72 J	0.91 J	0.8 J	0.85 J	0.66 J	0.76 J	0.79 J	0.66 J	1.1 J	0.93 J	0.58 J	0.57 J	0.73	0.97	0.88	10 U	1.5	1.3	1.2
pH	SU	7.03	7.27	7.04	7.15	7.2	7.17	6.57	7.2		7.1	7.28	7.35	5.71	7.2	7.44	8.29	6.78	7.58	7.13
Su fate	mg/L	310 J-	330	320	320	290	310	360	380	460	450		450	530	500	480	10 U	1600	1500	1400
Total Dissolved Solids	mg/L	770	830	840	750	710	810	970	910	970	1000		900	970	1100	940	2700	2600	920	2300
CCR Appendix IV																				
Ant mony	mg/L	0 00035 J	0.00039 J	0.00035 J	0.00028 J	0.002 U	0 002 U	0 002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0013 J	0.0016 J	0.0018 J	0.0028 J	0.005 U	0.0028 J	0.0025 J	0.0016 J			0.005 U		0.0012 J	0.0019 J	0.0011 J	0.0028 J	0.0015 J	0.0019 J	0.0017 J
Barium	mg/L	0.052	0.055	0.056	0.042	0.05	0.05	0.059	0.059			0.056		0.064	0 053	0.043	0.072	0.063	0.053	0.043
Beryllium	mg/L	0 00011 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 0003 J	0.00022 J			0.001 U		0.00047 J	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.00047 J	0.00046 J	0.002 U	0.002 U	0 002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U
Cobalt	mg/L	0 0056	0.0077	0.0055	0.0038	0.0044	0.0063	0.01	0.0095			0.006		0.01	0.0074	0.0049	0.00074 J	0 001 U	0.001 U	0.001 U
Fluoride	mg/L	0.72 J	0.91 J	0.8 J	0.85 J	0.66 J	0.76 J	0.79 J	0.66 J	1.1 J	0.93 J	0.58 J	0.57 J	0.73	0.97	0.88	10 U	1.5	1.3	1.2
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.0007 J			0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
L thium	mg/L	0.0034 J	0.008 U	0.008 U	0.0035 J	0.0031 J	0.0041 J	0 0037 J	0.0038 J			0.0024 J		0.0054 J	0.0041 J	0.0033 J	0.0043 J	0.0045 J	0.004 J	0.0035 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ			0 0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0.0084 J	0.0098 J	0.0095 J	0.01 U	0.01 U	0.0083 J	0.0081 J	0.007 J			0.0066 J		0.0087 J	0.0097 J	0.0087 J	0.015	0.017	0.025	0.026
Radium Total	pci/L	1 59	0.696	0.548	0.412 U	0.42 U	0.371 U	0.45	0.588			0.749 J		0.823 J	0.37 U		2.63	2 6 J	2.31	
Radium-226	pci/L	0.667 J	0.289	0.374	0.237 U	0.186	0.155	0.232 J	0.3			0.163		0.483 J	0.305 U		1.16	1.56 J	1.17	
Radium-228	pci/L	0.923	0.406	0.462 U	0.412 U	0.42 U	0.371 U	0 262 U	0.413 U			0.585 J		0.365 U	0.37 U		1.47	1.04	1 14	
Selenium	mg/L	0.005 U	0.005 U	0.003 J	0.003 J	0.005 U	0.008	0.0054	0.005			0.0028 J		0.0016 J	0.0045 J	0 0019 J	0.0012 J	0 005 U	0.005 U	0.005 U
Thallium	mg/L	0 00011 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U			0.001 U		0.00024 J	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Supplemental Parameters																				
Alkal nity Bicarbonate (HCO3)	mg/L																180			
Alkal nity Carbonate (CO3)	mg/L																5 U			
Alkal nity Hydrox de (OH)	mg/L																5 U			
Alkal nity Total	mg/L													260	270	250	180	180	170	170
Ferr c Iron	mg/L													0.035 J			6.7 J	6.8		
Ferrous Iron	mg/L													0.05 UJ			0.1 R	1.1 J		
Iron	mg/L														0.067 J	0.09 J			5.3	5.5
Magnesium	mg/L													39	41	38	72	87	73	72
Manganese	mg/L														0.46	0.61			0.46	0.49
Nitrate as N	mg/L														3.3	1.6	0.05 R		0.1 U	0.1 U
Nitrite as N	mg/L																0.05 R			
Nitrogen Nitrate-Nitrite	mg/L													0.53				0.049 J		
Phosphorus (as phosphate)	mg/L													0.31 U	0.31 U	0.31 U	0.031 U	0.31 U	0.31 U	0.31 U
Potassium	mg/L													6.6	5.5	6.5	12	13	13	13
Sodium	mg/L													14	14	9.9	290	240	230	120
Sample Parameters																				
Dissolved Oxygen	mg/L	0.6	1.81	0.59	0.52	0.51	1.96	1.02	0 84		0.48	0.8	3.52	2.64	0.81	0.38	0.13	0.67	0.19	0.2
Oxidation Reduction Potential	mV	111.2	64.2	-6.4	71.3	65.3	76.9	291.1	8.5		95.4	-55	-98.7	-233.3	135.1	-131.8	-197.6	-230.2	34.9	-196.7
Eh	mV	311.2	264.2	193.6	271.3	265.3	276.9	491.1	208.5		295.4	145.0	101.3	-33.3	335 1	68.2	2.4	-30.2	234.9	3.3
pH	SU	7.03	7.27	7.04	7.15	7.2	7.17	6.57	7.2		7.1	7.28	7.35	5.71	7.2	7.44	8.29	6.78	7.58	7.13
Spec f c Conductance	uS/cm	966	1072	1106	928	832	1121	1151	1157		1273	760	1060	1240	975	828	5178	3237	2357	1686
Temperature	deg C	14.4	19.2	16.7	12.9	10.63	11.8	14.6	16.5		18	10	10	16.95	10.3	15.3	15.03	13.86	12.4	12.9
Turb dity	NTU	4.6	4.51	1.26	3.2	4.76	2.17	2.87	0.9		0.49	1.3	1.75	1.08	2.72	4.58	4.48	3.01	2.86	1.11

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW08														GAMW08B					
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-04	2018-03-14	2018-04-23	2018-10-26	2019-05-08	2019-11-07	2018-09-07		2018-10-26		2019-05-03	2019-11-07
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	N	N	N	FD	N	FD	N	N	N
Chemical Name	Un t																				
CCR Appendix I I I																					
Boron	mg/L	3.5	3.9	3.2	3.4	3 3	3.2	2.9	2.2	3.7		2.4	1.8	1.4	2 5		18		15	14	13
Ca cium	mg/L	310	310	300	260	270	310	340	270	290		360	230	250	280		380		370	350	340
Ch oride	mg/L	88	71	89	99	110	86	83	39	87		64	56	49	66		240		180	160	180
Fluoride	mg/L	1 J	1 2 J	0.73 J	0.87 J	0.94 J	0.92 J	1.3 J	2 J	0.68 J	1 2 J	1.3 J-	1.6	2 2	1.9		1.6 J		1.5	1.9	1.7
pH	SU	6.92	7.03	6.85	7.02	7.09	6.93	7	7 27	6 89	7.41	7.41	6.99	7.37	7.5		7.7		7.45	7.57	7.85
Su fate	mg/L	770 J-	690	680	610	630	770	800	640	670		800	460	540	670		1500		1500	1400	1300
Total Dissolved Solids	mg/L	1600	1500	1600	1300	1400	1700	2000	1400	1500		1700	1100	1300	1300		1900 J		2300	2300	2200
CCR Appendix IV																					
Ant mony	mg/L	0 00073 J	0.00069 J	0.0014 J	0.00041 J	0.00043 J	0 002 U	0.00059 J	0.00075 J		0.002 U		0.00082 J	0.00076 J	0.00077 J		0.002 U		0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0018 J	0.0019 J	0.0018 J	0.0027 J	0.0016 J	0.0031 J	0 0027 J	0.0023 J		0.005 U		0.0011 J	0.0015 J	0.0016 J		0.005 U		0.005 U	0.005 U	0.005 U
Barium	mg/L	0.068	0.065	0.065	0.05	0 055	0.064	0.074	0.077		0.066	0.069	0.053	0.058	0.066		0.042		0.03	0 025	0 023
Beryllium	mg/L	0 00017 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.0004 J	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Cadmium	mg/L	7.4E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.00037 J	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.00029 J	0.002 U	0 002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.036	0.034	0.059	0.047	0.05	0.037	0.047	0.02		0.022	0.027	0.011	0.0079	0.011		0.00066 J		0.001 U	0.001 U	0.001 U
Fluoride	mg/L	1 J	1 2 J	0.73 J	0.87 J	0.94 J	0.92 J	1.3 J	2 J	0.68 J	1 2 J	1.3 J-	1.6	2 2	1.9		1.6 J		1.5	1.9	1.7
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
L thium	mg/L	0 0098	0.012	0.009	0.0098	0.0093	0.012	0.011	0.012		0 0089	0 009	0.011	0.015	0.0091		0.0098		0.0073 J	0.0063 J	0.0058 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U		0.0002 U	0.0002 U	0.0002 U		0.0002 U		0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.034	0.036	0.024	0.02	0 019	0.038	0.049	0.083		0.058	0.058	0.059	0.08	0.068		0.037		0.039	0 057	0 044
Radium Total	pci/L	1 07	1 08	1.09	0.581	0.777	0.632	1.11	0.762		1.13 J	0.99	1 J	0.473			1.67 J		1 02 J	0 704	
Radium-226	pci/L	0.501 J	0.469	0.557	0.375	0 368	0.383	0 613 J	0.591		0.267	0.437	0.582 J	0.312 U			1.09 J		0.596 J	0.438	
Radium-228	pci/L	1 U	0.609	0.533	0.43 U	0.423 U	0 365 U	0.499	0.341 U		0.865 J	0.552	0.423	0.456 U			0.579		0.454 U	0.518 U	
Selenium	mg/L	0.005 U	0.0065	0.0033 J	0.0014 J	0.0032 J	0.011	0.0088	0.0081		0.024	0.022	0.0021 J	0.016	0.0036 J		0 0014 J		0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.00045 J	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Supplemental Parameters																					
Alkal nity Bicarbonate (HCO3)	mg/L															160	160				
Alkal nity Carbonate (CO3)	mg/L															5 U	5 U				
Alkal nity Hydrox de (OH)	mg/L															5 U	5 U				
Alkal nity Total	mg/L												350	380	380	160	160	160	160	130	160
Ferr c Iron	mg/L												0.083 J			6.1 J	6.9 J	6 5	6.2		
Ferrous Iron	mg/L												0.05 UJ			0.1 R	0.1 R	0.79 J	0.98 J		
Iron	mg/L													0.2 U	0.2 U					5.6	5.1
Magnesium	mg/L												44	53	56	58	66	63	62	45	42
Manganese	mg/L													0.22	0.37					0.49	0.45
Nitrate as N	mg/L													7.7	0.25	0 05 R	0.05 R			0.075 J	0.43
Nitrite as N	mg/L															0 05 R	0.05 R				
Nitrogen Nitrate-Nitrite	mg/L												0.06					0.05 U	0 05 U		
Phosphorus (as phosphate)	mg/L												0.31 U	0.15 J	0.11 J-	0.028 J	0.031 U	0.31 U	0 31 U	0.31 U	0.19 J-
Potassium	mg/L												12	13	12	5.6	6.4	5 5	5.5	5.6	5.3
Sodium	mg/L												45	45	51	260	300	200	200	240	200
Sample Parameters																					
Dissolved Oxygen	mg/L	1.9	0.38	1.62	1.27	0.96	0.63	1.96	0.93	0 21	0.97	5.09	0.21	0.44	4.2		0.42		0.12	0.13	2.61
Oxidation Reduction Potential	mV	159.7	64.6	-8	58.4	49.9	60.4	242.5	61.9	-15.9	110.1	-106.4	27.7	62.2	44.1		-185.5		-67	7.9	-67
Eh	mV	359.7	264.6	192.0	258.4	249.9	260.4	442.5	261.9	184.1	310.1	93.6	227.7	262.2	244.1		14.5	200.0	133.0	207.9	133.0
pH	SU	6.92	7.03	6.85	7.02	7.09	6.93	7	7.27	6 89	7.41	7.41	6.99	7.37	7.5		7.7		7.45	7.57	7.85
Spec f c Conductance	uS/cm	1925	1807	1664	1517	1494	2098	1834	1713	1840	1121	1732	1440	1102	1322		2538		2375	2190	1896
Temperature	deg C	15 5	18.78	17.75	12.2	10.06	11.1	15.8	18.5	18.3	9.6	10.2	17.2	11	10.84		14.6		14.5	12.8	8.05
Turb dity	NTU	2.3	3.22	0.58	1.26	1.56	1.1	2.41	0 68	4 38	1.11	1.54	1.4	1.81	0.31		3.4		1.63	1.72	2.89

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nepheloметric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.
UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW09																
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-01		2017-04-26		2017-06-28	2017-08-23	2017-10-03	2018-03-14	2018-04-23	2018-10-25	2019-05-02		2019-11-07
Samp e Type		N	N	N	N	FD	N	FD	N	N	N	N	N	N	N	FD	N	N
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	5.7	4.7	7.3	5.3	7.7	7.6	5.9	6.1	4.9	7.9	7.3		4.9	6.3	3	3	2.7
Ca cium	mg/L	320	240	210	210	200	200	220	240	270	280	220		220	220	200	200	150
Ch oride	mg/L	63	55	58	58	75	73	71	67	53	39	64		58	82	46	46	39
Fluoride	mg/L	0.15 J	10 U	10 U	0.22 J	0.13 J	0.14 J	0 16 J	0.13 J	0.18 J	2 J	0.21 J	5 U	0.26 J-	0.28	0.27	0 27	0.33
pH	SU	7.27	7.25	7.12	6.68		7.44		7.15	7.25	7.31	7.3	7.28	6.87	6 88		7.1	7.06
Su fate	mg/L	910 J-	570	360	500	440	420	460	460	600	740	540		510	510 J-	530	530	380
Total Dissolved Solids	mg/L	1500	1100	880	980	1000	990	1000	960	1300	1400	1100		930	1100	970	980	770
CCR Appendix IV																		
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U		0 002 U		0.002 U	0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0015 J	0.0013 J	0.00076 J	0.0031 J	0.005 U	0 005 U	0.0028 J	0.0029 J	0.002 J	0.0027 J		0 005 U		0.005 U	0.005 U	0.005 U	0.005 U
Barium	mg/L	0.059	0.043	0.036	0.039	0.035	0.037	0.039	0.042	0 047	0.054		0.041	0.039	0.039	0.041	0.041	0.036
Beryllium	mg/L	0 00012 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00036 J	0 001 U	0.001 U	0.001 U		0 001 U		0.00092 J	0.00058 J	0.00052 J	0.00049 J
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.00033 J	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0 0036	0.002 U	0.00062 J	0.0013 J	0.002 U	0 002 U	0.002 U	0 002 U	0.0011 J	0.0015 J		0 0016 J		0.002 U	0.0012 J	0.0012 J	0.002 U
Cobalt	mg/L	0.001 U	0.00018 J	0.0002 J	0.0002 J	0.001 U	0 001 U	0.00029 J	0.00025 J	0.001 U	0.001 U		0 001 U		0.00038 J	0.00049 J	0.00055 J	0.00035 J
Fluoride	mg/L	0.15 J	10 U	10 U	0.22 J	0.13 J	0.14 J	0 16 J	0.13 J	0.18 J	2 J	0.21 J	5 U	0.26 J-	0.28	0.27	0 27	0.33
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.001 U	0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0019 J	0.008 U	0.008 U	0.0016 J	0.0011 J	0 0012 J	0.008 U	0 008 U	0.0017 J	0.0018 J		0 008 U		0.008 U	0.008 U	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.02	0.017	0.029	0.023	0.027	0.027	0.021	0.021	0 028	0 032		0.025	0.035	0.04	0.043	0.043	0.035
Radium Total	pci/L	1.5	0.568	0.477 U	0.467 U	0.55	0.469	0.593	0.414	0 707	0 803		1.45 J	0.096	0.679	0.505	0.427 U	
Radium-226	pci/L	0.506 J	0.231	0.397 U	0.257	0.134	0.166	0.194	0.205	0.255 J	0 357		0.188	0.204	0.446	0.33	0.355 U	
Radium-228	pci/L	0.994	0.349 U	0.477 U	0.467 U	0.427 U	0.432 U	0.398	0.36 U	0.452	0.446		1.26 J	-0.108	0.361 U	0.428 U	0.427 U	
Selenium	mg/L	0.014	0.0091	0.0049 J	0.011	0.014	0.014	0.019	0.02	0 013	0 027		0.0082	0.011	0 0098	0.012	0.012	0.0077
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.001 U	0.001 U	0.001 U	0.001 U
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L																	
Alkal nity Carbonate (CO3)	mg/L																	
Alkal nity Hydrox de (OH)	mg/L																	
Alkal nity Total	mg/L														150	110	100	110
Ferr c Iron	mg/L														0.042 J			
Ferrous Iron	mg/L														0.05 UJ			
Iron	mg/L															0.027 J	0.038 J	0.037 J
Magnesium	mg/L														21	21	19	16
Manganese	mg/L															0.011 J	0.013 J	0.0083 J
Nitrate as N	mg/L															5 6	5.6	7.1
Nitrite as N	mg/L																	
Nitrogen Nitrate-Nitrite	mg/L														1.4			
Phosphorus (as phosphate)	mg/L														0.31 U	0.31 U	0.31 U	0.31 UJ
Potassium	mg/L														9	7 2	7.1	5.6
Sodium	mg/L														38	35	33	28
Sample Parameters																		
Dissolved Oxygen	mg/L	3.59	6.69	1.98	6.1		3.41		3.92	5.27	3.24	5.98	6.71	5.43	0 22		5.82	5.54
Oxidation Reduction Potential	mV	-1.4	75.7	27.6	236		90.5		152.6	280.8	58.9	139.5	-116.3	-90.8	-48.8		53.6	-25.7
Eh	mV	198.6	275.7	227.6	436.0		290.5		352.6	480.8	258.9	339.5	83.7	109.2	151.2		253.6	174 3
pH	SU	7.27	7.25	7.12	6.68		7.44		7.15	7.25	7.31	7 3	7.28	6.87	6 88		7.1	7.06
Spec f c Conductance	uS/cm	1671	736	1110	822		1041		1209	702	1542	1331	600	1156	1274		888	685
Temperature	deg C	14.4	18.4	16.9	11.9		10.75		11.9	14.7	17.2	18.2	10.2	10.6	17.9		11.4	15.9
Turb dity	NTU	1.59	3.92	1.15	1.34		3.12		1.88	1.91	0.91	0.39	0.82	2.44	2.41		3.41	1.55

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW09B																		
Sample Date		2016-07-13		2016-09-08	2016-11-09	2017-01-10	2017-03-01	2017-04-26	2017-06-28	2017-08-23		2017-10-03	2018-03-14	2018-04-23	2018-09-06	2018-10-26	2019-05-08		2019-11-07
Samp e Type		FD	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	FD	N	N
Chemical Name	Un t																		
CCR Appendix I I I																			
Boron	mg/L	24	25	25	16	11	11	11	12	16	16	16		14	12	12		14	8
Ca cium	mg/L	260	280	270	190	200	170	170	180	180	180	160		160	150	180		150	150
Ch oride	mg/L	210	180	190	130	110	120	130	150	170	160	140		150	180	150		140	110
Fluoride	mg/L	0.54 J	0.55 J	0.67 J	0.68 J	0.1 J	1.3 J	1.2 J	1.4 J	1.2 J	0.37 J	1.5 J	1.4 J	1.6 J	1.8 J	1.6		1.6	1.5
pH	SU		7.08	7.15	6.96	7.36	7.44	7 29	7.36		7.46	7.36	7.56	7.43	7 32	7.46		7.49	7.56
Su fate	mg/L	970 J-	1000 J-	960	740	670 J	550	570	640	630	650	550		430	570	580		520	440
Total Dissolved Solids	mg/L	2100	2000	2100	1700	1300	1200	1200	1500	1500	1500	1300		990	1300	1200		1200	990
CCR Appendix IV																			
Ant mony	mg/L	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0 002 U		0.002 U	0.002 U		0.002 U	0.002 U
Arsenic	mg/L	0.0024 J	0.0026 J	0.002 J	0.0014 J	0 0027 J	0.005 U	0.004 J	0.004 J	0.0031 J	0.0031 J		0.0054	0.0064	0.0044 J	0 004 J		0.0057	0.0042 J
Barium	mg/L	0 069	0.071	0.076	0.062	0.048	0.04	0.046	0.055	0.062	0.058		0.045	0.04	0.049	0.047		0.041	0 029
Beryllium	mg/L	0.00012 J	9.1E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0 001 U		0.001 U	0.001 U		0.001 U	0.001 U
Cadmium	mg/L	0.00027 J	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0 001 U		0.001 U	0.001 U		0.001 U	0.001 U
Chromium	mg/L	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0 002 U		0.002 U	0.002 U		0.002 U	0.002 U
Cobalt	mg/L	0 001 U	0 001 U	0.00069 J	0.00028 J	0.00045 J	0.001 U	0 00028 J	0 00045 J	0.00041 J	0.00041 J		0 001 U		0.00058 J	0.00028 J		0.00025 J	0.001 U
Fluoride	mg/L	0.54 J	0.55 J	0.67 J	0.68 J	0.1 J	1.3 J	1.2 J	1.4 J	1.2 J	0.37 J	1.5 J	1.4 J	1.6 J	1.8 J	1.6		1.6	1.5
Lead	mg/L	0 001 U	0 001 U	0.001 U	0.00017 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0 001 U		0.001 U	0.001 U		0.001 U	0.001 U
L thium	mg/L	0.0055 J	0.0065 J	0.008 U	0.008 U	0 0049 J	0.0045 J	0.0056 J	0.0054 J	0.0047 J	0.0042 J		0.0031 J		0.0037 J	0.0052 J		0.0055 J	0.0033 J
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U		0.0002 U	0.0002 U
Molybdenum	mg/L	0.01 U	0.0079 J	0.0075 J	0.0097 J	0.013	0.015	0.015	0.013	0.0094 J	0.01		0.014	0.012	0.01	0.011		0.012	0.0096 J
Radium Total	pci/L	1.12	1.86	1.65	1.14	0.453	1.09	0.774	1 85	1.01	1.27		1.18 J	0.868	1.04	1.24 J		1.01	
Radium-226	pci/L	0.809 J	0.947 J	0.907	0.579	0.476	0.585	0.316	0.781 J	0.585	0.709		0.482	0.301	0.653	0.69 J		0.449	
Radium-228	pci/L	1 U	0.913	0.743	0.559	0.41 U	0.508	0.458	1 07	0.422	0.563		0.699 J	0.567	0.386	0.546		0.564	
Selenium	mg/L	0 005 U	0 005 U	0.005 U	0.005 U	0.002 J	0.005 U	0.0014 J	0.001 J	0.0015 J	0.0016 J		0 005 U		0.002 J	0.0019 J		0.005 U	0.0011 J
Thallium	mg/L	0.0003 J	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0 001 U		0.001 U	0.001 U		0.0002 J	0.001 U
Supplemental Parameters																			
Alkal nity Bicarbonate (HCO3)	mg/L														190				
Alkal nity Carbonate (CO3)	mg/L														5 U				
Alkal nity Hydrox de (OH)	mg/L														5 U				
Alkal nity Total	mg/L														190	200	200	200	170
Ferr c Iron	mg/L														2.5 J	2.1			
Ferrous Iron	mg/L														0.1 R	0.55 J			
Iron	mg/L																3 2	3.2	3
Magnesium	mg/L														57	60	64	63	54
Manganese	mg/L																1 2	1.2	1 2
Nitrate as N	mg/L														0.05 R		0.1 U	0.1 U	0.12
Nitrite as N	mg/L														0.05 R				
Nitrogen Nitrate-Nitrite	mg/L															0.077			
Phosphorus (as phosphate)	mg/L														0.09	0.31 U	0.31 U	0.31 U	0.31 UJ
Potassium	mg/L														4 J	3.8 J	4 J	4 J	2.4 J
Sodium	mg/L														150	94	110	110	46
Sample Parameters																			
Dissolved Oxygen	mg/L		0.44	1.06	0.43	0.38	0.44	0 61	0.71		0.57	0.45	0.1	0.04	0 61	0.28		0.04	0.35
Oxidation Reduction Potential	mV		-57.7	67.3	-76.4	-100.1	-80.6	-102.6	68 2		19.7	-46 8	-121.6	-130.5	-100.5	-101 1		-16.8	-131.8
Eh	mV		142.3	267.3	123 6	99.9	119.4	97.4	268.2		219.7	153 2	78.4	69.5	99 5	98.9		183.2	68.2
pH	SU		7.08	7.15	6.96	7.36	7.44	7 29	7.36		7.46	7.36	7.56	7.43	7 32	7.46		7.49	7.56
Spec f c Conductance	uS/cm		2356	2435	2088	1559	1352	1592	1561		1922	1722	1053	1301	1556	1693		1165	9.24
Temperature	deg C		14.1	14.7	15.1	13.6	13.45	14.5	14 8		15.5	16	14	14.4	16.1	16		14.2	14.4
Turb dity	NTU		3.48	4.29	2.17	0.99	2.58	1 88	1.69		2.54	1.96	4.18	4.11	2.96	1.39		4.7	3.36

Notes:
CCR = coal combustion res dual
mg/L = m ligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.
UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW15														
Sample Date		2016-07-13	2016-09-08		2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-03	2018-03-15	2018-04-24	2018-10-26	2019-05-06	2019-11-08
Samp e Type		N	FD	N	N	N	N	N	N	N	N	N	N	N	N	N
Chemical Name	Un t															
CCR Appendix I I I																
Boron	mg/L	0 75	0.45 J	1 J	1.1	0.6	0.44	0.45	0 87	0.91	0.66		0.72	0.76	0.71	0.73
Ca cium	mg/L	100	130	120	100	82	81	95	160	150	77		170	120	140	100
Ch oride	mg/L	28	31	31	27	28	27	27	27	25	19		24	21	22	28
Fluoride	mg/L	1.2 J	0.85 J	0.85 J	0 74 J	0.8 J	0.77 J	0.74 J	0.82 J	0.82 J	0.93 J	0.67 J	0.76 J	0.69	0.52	0.73
pH	SU	6.88		6.98	6.83	6.96	6.99	6.76	6.61	6.96	6.88	6.95	6.89	5.2	7.1	7 34
Su fate	mg/L	160 J-	260	260	150	140	140	160	300	330	260		410	240	380	260
Total Dissolved Solids	mg/L	570	660	630	520	400	400	420	780	750	660		790	5900	740	640
CCR Appendix IV																
Ant mony	mg/L	0.002 U	0.00041 J	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.056	0.072	0 069	0.078	0.076	0.054	0.062	0.059	0.066		0 058		0.091	0.081	0.075
Barium	mg/L	0.044	0.053	0 053	0.039	0.032	0.031	0.034	0.054	0.058		0.047		0.046	0.047	0.037
Beryllium	mg/L	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0 002 U	0.002 U	0.00027 J	0.00028 J	0.00029 J	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0 0019	0.0022	0.0022	0.0021	0.0019	0.0018	0.0022	0 0029	0.0027		0.0025		0.0023	0.0035	0.0017
Fluoride	mg/L	1.2 J	0.85 J	0.85 J	0.74 J	0.8 J	0.77 J	0.74 J	0.82 J	0.82 J	0.93 J	0.67 J	0.76 J	0.69	0.52	0.73
Lead	mg/L	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0053 J	0 008 U	0.008 U	0.008 U	0.004 J	0.0024 J	0.0041 J	0.0058 J	0.005 J		0.0023 J		0 0054 J	0.0053 J	0.0027 J
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0 02	0.027	0 026	0.023	0.022	0.022	0.026	0.017	0.019		0 029		0.016	0.017	0.029
Radium Total	pci/L	5 U	0.479	0 513	0.646 U	0.555 J	0.339 U	0.463 U	0.335	0.342 U		0.657 J		0.858 J	0.476 U	
Radium-226	pci/L	1 U	0.202	0.145	0.337 U	0.38	0.127 U	0.1	0.0965 J	0.104		0.0617		0.527 J	0.28 U	
Radium-228	pci/L	1 U	0 397 U	0.382 U	0.646 U	0.401 U	0 339 U	0.463 U	0.278 U	0.342 U		0.576 J		0.407 U	0.476 U	
Selenium	mg/L	0.005 U	0 005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U	0.005 U	0.005 U		0.005 U		0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Supplemental Parameters																
Alkal nity Bicarbonate (HCO3)	mg/L															
Alkal nity Carbonate (CO3)	mg/L															
Alkal nity Hydrox de (OH)	mg/L															
Alkal nity Total	mg/L													180	180	170
Ferr c Iron	mg/L													4.3		
Ferrous Iron	mg/L													5.2 J		
Iron	mg/L														11	5.4
Magnesium	mg/L													24	30	24
Manganese	mg/L														0.089	0.055
Nitrate as N	mg/L														0.1 U	0.1 U
Nitrite as N	mg/L															
Nitrogen Nitrate-Nitrite	mg/L													0.05 U		
Phosphorus (as phosphate)	mg/L													4	1.4	1.3
Potassium	mg/L													2.6 J	3.2 J	3.3 J
Sodium	mg/L													24	32	30
Sample Parameters																
Dissolved Oxygen	mg/L	0.48		0.48	0.14	0.25	0.16	0.19	1	0.32	0.29	0.06	0.02	1.97	0.15	0.12
Oxidation Reduction Potential	mV	-79.2		-60.1	-111	-114.3	-104.1	-104.4	-46.9	-43.7	-13.8	-56.8	-99.1	-254.7	-27.5	-100
Eh	mV	120.8		139.9	89.0	85.7	95.9	95 6	153.1	156.3	186.2	143.2	100.9	-54.7	172.5	100.0
pH	SU	6.88		6.98	6.83	6.96	6.99	6.76	6.61	6.96	6.88	6.95	6.89	5.2	7.1	7.34
Spec f c Conductance	uS/cm	779		909	733	594	584	674	9.32	1004	901	581	933	855	730	598
Temperature	deg C	15 3		20.3	19.9	14.6	12.1	11 6	14.6	16.6	18.1	10.8	10.6	17.1	8.3	15.8
Turb dity	NTU	4.48		2.96	3.41	3.98	4.4	4.92	4.2	3.1	4.11	3.98	4.29	3.1	4.9	6.9

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW158																
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-03	2018-03-15	2018-04-24	2018-09-06		2018-10-26	2019-05-08	2019-11-08	
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	FD	N	N	N	FD	N
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	1.1	1.7	2	3.7	3.3	3.6	3.1	2.1	2.1		4.4		4.1	4.9	10		6.2
Ca cium	mg/L	160	160	160	180	160	170	190	170	73		230		200	210	280		280
Ch oride	mg/L	52	58	62	81	64	65	71	64	64		87		89	93	110		80
Fluoride	mg/L	0.65 J	0.62 J	0.46 J	0.74 J	0.77 J	0.75 J	0.72 J	0.61 J	0.5 J	0.69 J	0.79 J		0.6 J	0.6	0.84 J		0.89
pH	SU	7.81	7.49	7.04	7.52	7.48	7.11	7.26	7 37	7.42	7.45	7.36		7.8	6.74	7.43		7.57
Su fate	mg/L	380 J-	390	340	500	390	460	530	540	500		790		720	770	1300		940
Total Dissolved Solids	mg/L	830	800	840	1000	890	980	1200	1100	1100		1400		1400	1400	2100		1600
CCR Appendix IV																		
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U			0.002 U	0 002 U	0.002 U		0.002 U
Arsenic	mg/L	0.003 J	0.0011 J	0.0014 J	0.0022 J	0.0011 J	0.00098 J	0.00084 J	0.00081 J		0.005 U			0.005 U	0 005 U	0.00088 J		0.005 U
Barium	mg/L	0.054	0.053	0.056	0.056	0 051	0.052	0.064	0.069		0.068			0.07	0.064	0.081		0.054
Beryllium	mg/L	7 8E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0.001 U	0 001 U	0.001 U		0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0.001 U	0 001 U	0.001 U		0.001 U
Chromium	mg/L	0 00062 J	0.002 U	0.002 U	0.00033 J	0.00034 J	0 002 U	0 002 U	0.002 U		0.002 U			0.002 U	0 002 U	0.002 U		0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.00016 J	0 001 U	0 001 U	0.001 U		0 00029 J			0 00037 J	0 001 U	0.001 U		0.001 U
Fluoride	mg/L	0.65 J	0.62 J	0.46 J	0.74 J	0.77 J	0.75 J	0.72 J	0.61 J	0.5 J	0.69 J	0.79 J		0.6 J	0.6	0.84 J		0.89
Lead	mg/L	0.001 U	0.001 U	0.00023 J	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U			0.001 U	0 001 U	0.001 U		0.001 U
L thium	mg/L	0.0069 J	0.008 U	0.008 U	0.0077 J	0.0053 J	0.0082	0.0082	0.0077 J		0.007 J			0.008	0.0096	0.012		0.0085
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U			0.0002 U	0.0002 U	0.0002 U		0 0002 U
Molybdenum	mg/L	0.011	0.013	0.01	0.012	0 015	0.014	0.014	0.012		0.011			0.01	0.011	0.012		0.01
Radium Total	pci/L	1 26	0.594	0.61	1.14 J	0.876	0.687	0.789	0.872		1.69 J			1.31	1.51 J	1.61		
Radium-226	pci/L	0.607 J	0.442	0.361 U	0.785	0.441	0.442	0.537 J	0.547		0.752			0.711	0.837 J	1.07		
Radium-228	pci/L	1 U	0.389 U	0.498 U	0.502 U	0.435	0.378 U	0 329 U	0.363 U		0.94 J			0.603	0.676	0.544		
Selenium	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U		0.005 U			0.0017 J	0 005 U	0.005 U		0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0.001 U	0 001 U	0.0003 J		0.001 U
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L												180	180				
Alkal nity Carbonate (CO3)	mg/L												5 U	5 U				
Alkal nity Hydrox de (OH)	mg/L												5 U	5 U				
Alkal nity Total	mg/L												180	180	200	200	180	180
Ferr c Iron	mg/L												2 J	2.1 J	1.8			
Ferrous Iron	mg/L												0.1 R	0.1 R	0.38 J			
Iron	mg/L															4.6	3	3.1
Magnesium	mg/L												36	39	39	62	43	45
Manganese	mg/L															0.59	0.54	0.57
Nitrate as N	mg/L												0.05 R	0.05 R		0.1 U	0.1 U	0.1 U
Nitrite as N	mg/L												0.05 R	0.05 R				
Nitrogen Nitrate-Nitrite	mg/L														0.05 U			
Phosphorus (as phosphate)	mg/L												0.031 U	0.031 U	0.31 U	0.14 J	0.31 U	0 31 U
Potassium	mg/L												4.5 J	5	4.7 J	7.2	5.1	5.3
Sodium	mg/L												140	150	170	280	130	130
Sample Parameters																		
Dissolved Oxygen	mg/L	0.22	0.91	0.56	0.22	0.46	0 3	0.43	0 64	0 23	0.08	0.04		0.29	2.06	0 23		0.16
Oxidation Reduction Potential	mV	-129.7	-21.6	-94.6	-132.6	-81 7	-79 6	-21.3	-36.5	-42.6	-64	-102.4		-91.2	-256.1	46 3		-189 2
Eh	mV	70 3	178.4	105.4	67.4	118.3	120.4	178.7	163.5	157.4	136.0	97.6		108.8	-56.1	246.3		10.8
pH	SU	7.81	7.49	7.04	7.52	7.48	7.11	7.26	7.37	7.42	7.45	7.36		7.8	6.74	7.43		7.57
Spec f c Conductance	uS/cm	834	1049	1060	1237	940	1096	1099	1110	1294	1255	1612		2757	1889	1798		1384
Temperature	deg C	12.71	15.9	16.1	13.9	13.6	13	13.8	14.2	14.5	13.3	13		14.13	13 6	8.1		13.8
Turb dity	NTU	4.72	1.56	1.48	3.8	2.23	3.65	3.16	1 78	0.4	4.59	4.88		3.59	1.35	3.56		1.49

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW16															
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-15	2018-04-24	2018-10-29		2019-05-03	2019-11-08	
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	FD	N	N	FD	N
Chemical Name	Un t																
CCR Appendix I I I																	
Boron	mg/L	1.1	1.8	1.6	1.2	0.89	1.3	1	1.4	1.1		1.4	1.4	1.4	1.6		1.9
Ca cium	mg/L	230	180	170	120	160	210	220	240	57		220	160	160	210		210
Ch oride	mg/L	53	37	30	28	24	25	28	31	42		58	36	36	28		59
Fluoride	mg/L	1.4 J	1 6 J	1.3 J	1.5	1.3 J	1.3 J	1.2 J	1.3 J	1.5 J	1 J	1.2 J	1.1	1.1	0.99		1.1
pH	SU	7.92	7.18	7.48	7.5	7.58	7.17	7.36	7 06	7 62	7.41	7.67		7.28	7.46		7.8
Su fate	mg/L	530 J-	400	320	47	300	500	480	630	520		530	340	350	570		530
Total Dissolved Solids	mg/L	1100	810	790	570	670	930	1000	1100	980		1100	740	730	1100		1100
CCR Appendix IV																	
Ant mony	mg/L	0.002 U	0.002 U	0.00028 J	0.002 U	0.002 U	0 002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0 002 U		0 002 U
Arsenic	mg/L	0.011	0.0077	0.012	0.0084	0.0079	0.006	0.008	0.0096		0.002 J	0.0065	0.01	0.0098	0.005		0.0082
Barium	mg/L	0.049	0.042	0.035	0.024	0 029	0.043	0.044	0.054		0.057	0.045	0.035	0.035	0.034		0 034
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0 001 U		0 001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0 001 U		0 001 U
Chromium	mg/L	0 00062 J	0.002 U	0.002 U	0.0031	0.002 U	0 002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0 002 U		0 002 U
Cobalt	mg/L	0.001 U	0.00068 J	0.00051 J	0.00046 J	0.00055 J	0.00092 J	0.00094 J	0.0011		0 0013		0.00059 J	0 00061 J	0.00066 J		0.00061 J
Fluoride	mg/L	1.4 J	1 6 J	1.3 J	1.5	1.3 J	1.3 J	1.2 J	1.3 J	1.5 J	1 J	1.2 J	1.1	1.1	0.99		1.1
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0 001 U		0 001 U
L thium	mg/L	0 00043 J	0.008 U	0.008 U	0.00023 J	0.008 U	0 008 U	0 008 U	0.008 U		0.008 U		0.008 U	0.008 U	0 008 U		0 008 U
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U		0.0002 U	0.0002 U	0.0002 U		0.0002 U
Molybdenum	mg/L	0.024	0.036	0.045	0.044	0.03	0.027	0.023	0.024		0.027	0.031	0.033	0.033	0.027		0 028
Radium Total	pci/L	1 68	0.543	0.527 U	0.629 U	0 648	0.392 U	0 339 U	0.429		0.862 J	0.29	0.862 J	1.32 J	0.685 U		
Radium-226	pci/L	0.537 J	0.249	0.363 U	0.256 U	0.129 U	0.094	0.106 J	0.246		0.1	0.0822	0.214 J	0.278 J	0 277 U		
Radium-228	pci/L	1 14	0.395 U	0.527 U	0.629 U	0 528	0.392 U	0 339 U	0.322 U		0.762 J	0.208	0.648 J	1.04 J	0 685 U		
Selenium	mg/L	0.005 U	0.005 U	0.0005 J	0.0005 J	0.005 U	0.0012 J	0 005 U	0.005 U		0.0015 J		0.005 U	0.005 U	0 005 U		0 0015 J
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0 001 U		0 001 U
Supplemental Parameters																	
Alkal nity Bicarbonate (HCO3)	mg/L																
Alkal nity Carbonate (CO3)	mg/L																
Alkal nity Hydrox de (OH)	mg/L																
Alkal nity Total	mg/L													180	200	5 U	210
Ferr c Iron	mg/L													1,8			
Ferrous Iron	mg/L													0.19 J			
Iron	mg/L														1.4	1.6	1 7
Magnesium	mg/L													23	29	29	31
Manganese	mg/L														0.35	0.29	0.31
Nitrate as N	mg/L														0.042 J	0.1 U	0 1 U
Nitrite as N	mg/L																
Nitrogen Nitrate-Nitrite	mg/L													0.056			
Phosphorus (as phosphate)	mg/L													1.2	0.55	0.47	0.42
Potassium	mg/L													4.3 J	4.2 J	4.9 J	5 2
Sodium	mg/L													41	41	36	38
Sample Parameters																	
Dissolved Oxygen	mg/L	0.16	0.27	0.48	0.31	0.36	0.14	0.5	0 14	0 06	0.22	0.22		1.27	0.29		4.02
Oxidation Reduction Potential	mV	-18.06	711.6	-124 8	-78.8	-136.9	-73 6	-114.2	9.6	-158.4	-55.9	-106.5		-216.8	8		-2
Eh	mV	181.9	911.6	75.2	121.2	63.1	126.4	85.8	209.6	41.6	144.1	93.5		-16.8	208.0		198.0
pH	SU	7.92	7.18	7.48	7.5	7.58	7.17	7.36	7.06	7 62	7.41	7.67		7.28	7.46		7.8
Spec f c Conductance	uS/cm	1331	1112	927	751	821	1257	1123	1406	1254	1029	1239		1046	1001		1014
Temperature	deg C	15.02	18.8	18.15	12.1	9.72	10.6	15.41	18	17.8	8.71	9.2		17.81	10 5		17.52
Turb dity	NTU	3.89	2.16	1.93	3.16	4.14	3.25	4.33	2.45	4.95	4.62	12.81		3.64	4.65		3.98

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW16B																
Sample Date		2016-07-13	2016-09-08	2016-11-09		2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-15	2018-04-24	2018-09-07	2018-10-29	2019-05-06	2019-11-08	
Samp e Type		N	N	FD	N	N	N	N	N	N	N	N	N	N	N	N	FD	N
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	1.8	1.6	1.4	1.4	1.4	1.4	1.1	3.4	6.5	2.9		4.1	7.6	9.7	12	11	10
Ca cium	mg/L	230	190	180	180	210	210	270	220	260	100		250	310	350	350	300	280
Ch oride	mg/L	63	56	57	55	57	47	71	71	120	78		140	160	150	190	220	210
Fluoride	mg/L	1.1 J	1 1 J	0.84 J	0.73 J	0.99 J	0.87 J	0.83 J	0.76 J	0.78 J	1 J	0.8 J	0.76 J	0 73 J	0.64	0.76	1	1
pH	SU	7.76	7.47		7.41	7.57	7.55	7.3	7.51	7.28	7.54	7.6	7.65	7.97	7.02	7.49		7.85
Su fate	mg/L	580 J-	480	500	440	50	470	730	720	640	580		690	760	890	940	1500	1500
Total Dissolved Solids	mg/L	1100	1000	1000	1000	1000	1000	1300	1200	1400	1200		1400	20 U	1600	1800	2400	2400
CCR Appendix IV																		
Ant mony	mg/L	0.002 U	0.002 U	0.00057 J	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U		0.00095 J		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0 0068	0.0064	0.011	0.011	0.012	0.0095	0.012	0 0096	0.0081		0.0099	0.0097	0.011	0.0088	0.0071	0.0079	0.0076
Barium	mg/L	0.072	0 04	0.036	0.035	0.038	0.039	0.055	0.043	0.046		0.053	0.058	0.068	0.071	0.079	0.055	0.054
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.00022 J		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.00029 J	0.002 U	0.00026 J	0 002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.00016 J	0.00019 J	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.0003 J		0.00054 J	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	1.1 J	1 1 J	0.84 J	0.73 J	0.99 J	0.87 J	0.83 J	0.76 J	0.78 J	1 J	0.8 J	0.76 J	0 73 J	0.64	0.76	1	1
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0055 J	0.008 U	0.0032 J	0.0022 J	0 0058 J	0.0035 J	0.0072 J	0 006 J	0.0061 J		0.007 J		0 0059 J	0.0059 J	0.007 J	0.0054 J	0.0055 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.013	0.012	0.012	0.012	0.012	0.013	0.023	0.016	0.013		0 016	0.015	0.012	0.011	0.014	0 02	0.019
Radium Total	pci/L	1 31	1 05	0.866	0.794	0.998 J	0.577	1 23	0.795	1.21		1.11 J	0.99	1.17 J	1.64 J	0.984		
Radium-226	pci/L	0.651 J	0.458	0.427	0.412 U	0.507	0.348	0.635	0.54 J	0.559		0.443	0.535	0.724 J	0.719 J	0.753		
Radium-228	pci/L	0 66	0 59	0.467 U	0.435 U	0.491 J	0 399 U	0.597	0.287 U	0.647		0.671 J	0.455	0 522 U	0.919 J	0.459 U		
Selenium	mg/L	0.005 U	0.005 U	0.00061 J	0.005 U	0.005 U	0 005 U	0.005 U	0.005 U	0.005 U		0.005 U		0.005 U	0.005 U	0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L													200				
Alkal nity Carbonate (CO3)	mg/L													5 U				
Alkal nity Hydrox de (OH)	mg/L													5 U				
Alkal nity Total	mg/L													200	210	190		200
Ferr c Iron	mg/L													6 J	5.1			
Ferrous Iron	mg/L													0.1 R	1.8 J			
Iron	mg/L															9.2		7.5
Magnesium	mg/L													46	53	58		49
Manganese	mg/L															0.49		0.39
Nitrate as N	mg/L													0.05 R		0.018 J		0.1 U
Nitrite as N	mg/L													0.05 R				
Nitrogen Nitrate-Nitrite	mg/L														0.063			
Phosphorus (as phosphate)	mg/L													0.19	0 28 J	0.22 J		0.17 J
Potassium	mg/L													4.9 J	5.2	5.5		6.3
Sodium	mg/L													84	84	97		380
Sample Parameters																		
Dissolved Oxygen	mg/L	1.23	1.63		0.39	0.3	0.21	0.12	0.32	0.16	0.15	0.28	0.25	1.02	4.23	0 33		3.41
Oxidation Reduction Potential	mV	-122.6	-89		-126.3	-148.5	-132.2	-130.2	-123.1	-32.7	-135.8	-75.5	-117.8	-101.5	-166.8	21.2		-99.5
Eh	mV	77.4	111.0	200.0	73.7	51.5	67.8	69 8	76.9	167.3	64.2	124.5	82.2	98.5	33.2	221.2		100.5
pH	SU	7.76	7.47		7.41	7.57	7.55	7.3	7.51	7.28	7.54	7.6	7.65	7.97	7.02	7.49		7.85
Spec f c Conductance	uS/cm	1147	1297		1158	1230	1192	1645	1333	1665	1461	1142	1653	3104	2098	1692		2340
Temperature	deg C	13.04	14.44		15 27	14.3	13.37	12 3	13.48	14.3	15	12.6	12.3	15	17.7	11.2		14.65
Turb dity	NTU	4.1	3.99		1 8	2.76	4.21	4.58	3.27	2.48	3.9	4.08	4 2	4.99	3.49	3.72		2.81

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW17																
Sample Date		2016-07-14	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-14		2018-04-23		2018-10-29	2019-05-09	2019-11-08	
Samp e Type		N	N	N	N	N	N	N	N	N	FD	N	FD	N	N	N	N	
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	12	12	11	11	11	8.9	7.6	12	12			5.8	5.8	16	7.7	4.9	
Ca cium	mg/L	150	160	170	180	200	180	120	150	64			110	110	200	130	120	
Ch oride	mg/L	110	100	130	150	140	81	170	130	160			40	38	150	90	92	
Fluoride	mg/L	1.8 J	2 2 J	2 J	1.9 J	1.6 J	1.6 J	0.79 J	1.9 J	2.4 J	5 U	1.7 J	1.9 J	1.9 J-	1.7	1.6	1.7	
pH	SU	7.56	7.27	7.21	7.33	7.54	7.23	7.4	7 16	7 22		7.62		7 82	6.85	7.53	7.75	
Su fate	mg/L	330 J-	330	360	390	390	390	520	250	350			240	220	430	300	290	
Total Dissolved Solids	mg/L	940	920	940	1000	1100	950	1400	890	1000			630	620	1100	800	860	
CCR Appendix IV																		
Ant mony	mg/L	0 00034 J	0.00032 J	0.00032 J	0.002 U	0.00028 J	0 002 U	0 002 U	0.002 U		0.002 U	0.002 U			0.002 U	0.002 U	0 002 U	
Arsenic	mg/L	0 0054	0.0056	0.0042 J	0.0069	0.0055	0.0054	0 0035 J	0.0028 J		0.005 U	0.0027 J			0.004 J	0 0021 J	0.0028 J	
Barium	mg/L	0.047	0.056	0.054	0.05	0 054	0.048	0.044	0.06		0.041	0.058		0.029	0.073	0.041	0.052	
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.00076 J	0 001 U	
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0 001 U	
Chromium	mg/L	0.0015 J	0.002 U	0.0011 J	0.0011 J	0.0012 J	0.0012 J	0 002 U	0.002 U		0.0017 J	0.0014 J			0.002 U	0.002 U	0 002 U	
Cobalt	mg/L	6 3E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0 001 U	
Fluoride	mg/L	1.8 J	2 2 J	2 J	1.9 J	1.6 J	1.6 J	0.79 J	1.9 J	2.4 J	5 U	1.7 J	1.9 J	1.9 J-	1.7	1.6	1.7	
Lead	mg/L	0 00018 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0 001 U	
L thium	mg/L	0.0047 J	0.008 U	0.0036 J	0.0047 J	0.0024 J	0.0045 J	0 0058 J	0.0076 J		0.008 U	0.0035 J			0.0066 J	0 0035 J	0.0052 J	
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U	0.0002 U			0.0002 U	0.0002 U	0.0002 U	
Molybdenum	mg/L	0.015	0.012	0.011	0.01 U	0.01	0.011	0.018	0.024		0.024	0.024		0.02	0.017	0.017	0.012	
Radium Total	pci/L	0.569	0.451 U	0.447 U	0.553 U	0.428	0.477	0.403 U	0.71		0.816 J	0.384 U		0.205	1.1 J	0.518 U		
Radium-226	pci/L	1 U	0.331	0.415 U	0.246 U	0 222	0.23	0 191 J	0.215		0.202	0.112		0.0399	0.315 J	0.26 U		
Radium-228	pci/L	1 U	0.451 U	0.447 U	0.553 U	0.402 U	0.406 U	0.403 U	0.495		0.614 J	0.384 U		0.166	0.783 J	0.518 U		
Selenium	mg/L	0.019	0 03	0.018	0.023	0 028	0.026	0.0081	0.0032 J		0.0074	0.021		0.015	0.022	0.004 J	0.011	
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.00063 J	0 001 U	
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L																	
Alkal nity Carbonate (CO3)	mg/L																	
Alkal nity Hydrox de (OH)	mg/L																	
Alkal nity Total	mg/L														190	160	160	
Ferr c Iron	mg/L														0.1 U			
Ferrous Iron	mg/L														0.05 UJ			
Iron	mg/L															0.2 U	0 2 U	
Magnesium	mg/L														67	49	40	
Manganese	mg/L															0.015 U	0 015 U	
Nitrate as N	mg/L															0.97	2	
Nitrite as N	mg/L																	
Nitrogen Nitrate-Nitrite	mg/L														2.8			
Phosphorus (as phosphate)	mg/L														0.47	0 28 J	0.3 J	
Potassium	mg/L														5.3	3.5 J	5	
Sodium	mg/L														34	31	28	
Sample Parameters																		
Dissolved Oxygen	mg/L	5.78	1.7	1.8	1.01	2.35	7.33	3.18	4 33	3.3		4.99		9	1.78	5.75	6.47	
Oxidation Reduction Potential	mV	45 8	825.9	6.1	82.3	6.6	67.9	23.3	8	57.9		-90.2		-90.2	-237	53.1	35	
Eh	mV	245.8	1025.9	206.1	282.3	206.6	267.9	223.3	208.0	257.9	200.0	109.8		109.8	-37.0	253.1	235.0	
pH	SU	7.56	7.27	7.21	7.33	7.54	7.23	7.4	7.16	7.22		7.62		7 82	6.85	7.53	7.75	
Spec f c Conductance	uS/cm	1059	1287	1141	1272	1541	1290	902	1151	1357		832		675	1513	894	798	
Temperature	deg C	17.23	20.6	18.63	13.6	10.95	11.8	17.71	24.4	22.3		10.9		11.4	20	12.1	17.23	
Turb dity	NTU	1.56	1.09	0.58	2.58	0.44	2.21	1.02	1.5	2 51		0.54		1.19	0.45	0.44	0.86	

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW17B														
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-04	2018-03-14	2018-04-23	2018-09-06	2018-10-29	2019-05-09	2019-11-08
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Chemical Name	Un t															
CCR Appendix I I I																
Boron	mg/L	18	19	19	21	22	20	16	13	11		13	10	12	12	9.4
Ca cium	mg/L	230	250	240	250	270	250	240	160	57		180	150	150	180	150
Ch oride	mg/L	180	170	180	190	200	200	71	99	130		140	120	110	130	110
Fluoride	mg/L	0.9 J	0.98 J	0.68 J	0.58 J	0.6 J	0.6 J	2.1 J	1.3 J	1.1 J	0.55 J	0.58 J	0.84 J	0.71	0.62	0.67
pH	SU	7.43	7.37	7.1	7.24	7.44	7.02	7.25	7 19	7 38	7.48	7.39	7.63	7.4	7.15	7.66
Su fate	mg/L	710 J-	680	710	740	710	680	300	380	420		520	350	350	270	350
Total Dissolved Solids	mg/L	1500	1400	1400	1500	1700	1500	660	1000	960		1100	940	950	980	990
CCR Appendix IV																
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0 002 U
Arsenic	mg/L	0.0024 J	0.0021 J	0.0024 J	0.0035 J	0.0023 J	0.0022 J	0 0023 J	0.0026 J		0.0011 J		0.0017 J	0.0023 J	0.0022 J	0.0019 J
Barium	mg/L	0.078	0.079	0.086	0.092	0 1	0.089	0.065	0.06		0.085	0.069	0.066	0.073	0.11	0.074
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.00033 J	0 001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0 001 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0 002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.0003 J	0.001 U	0.001 U	0 001 U
Fluoride	mg/L	0.9 J	0.98 J	0.68 J	0.58 J	0.6 J	0.6 J	2.1 J	1.3 J	1.1 J	0.55 J	0.58 J	0.84 J	0.71	0.62	0.67
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0 001 U
L thium	mg/L	0.0017 J	0.008 U	0.008 U	0.0019 J	0.00046 J	0.0021 J	0 0019 J	0.008 U		0.008 U		0.008 U	0.008 U	0.008 U	0 008 U
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.024	0.021	0.013	0.011	0 012	0.011	0.017	0.021		0.017	0.016	0.01	0.011	0.0073 J	0.01
Radium Total	pci/L	1 79	1 84	2.53	2.58	1.25	1.94	1.03	2.4			1.21	1.47	2.48 J	1.71	
Radium-226	pci/L	0.882 J	0.864	1.28	1.4	1.01	1.09	0 639 J	0.867			0.518	0.945	1.15 J	0.964	
Radium-228	pci/L	0.913	0.98	1.25	1.17	0.423 U	0.846	0.395	1.53			0.696	0.524	1.33 J	0.748	
Selenium	mg/L	0.005 U	0.005 U	0.005 U	0.00053 J	0.00051 J	0 005 U	0 005 U	0.005 U		0.005 U		0.0011 J	0.005 U	0.005 U	0 005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.00022 J	0 001 U
Supplemental Parameters																
Alkal nity Bicarbonate (HCO3)	mg/L												210			
Alkal nity Carbonate (CO3)	mg/L												5 U			
Alkal nity Hydrox de (OH)	mg/L												5 U			
Alkal nity Total	mg/L												210	230	300	190
Ferr c Iron	mg/L												4.1 J	3		
Ferrous Iron	mg/L												0.1 R	1.5 J		
Iron	mg/L														6.8	5.1
Magnesium	mg/L												32	33	53	44
Manganese	mg/L														1	0.76
Nitrate as N	mg/L												0.05 R		0.1 U	0.1 U
Nitrite as N	mg/L												0.05 R			
Nitrogen Nitrate-Nitrite	mg/L													0.23		
Phosphorus (as phosphate)	mg/L												0.46	0.17 J	0.31 U	0.31 U
Potassium	mg/L												5.7	6 2	9.5	6.1
Sodium	mg/L												83	110	39	42
Sample Parameters																
Dissolved Oxygen	mg/L	0.33	0.24	0.67	0.36	0.13	0.13	0.18	0 14	0 09	0.16	0.11	0.2	0.88	0.23	4.2
Oxidation Reduction Potential	mV	-115	654	-100 8	-119.6	-91 8	102 3	-98.6	-51.1	-129.4	-95.2	-131.9	-91.9	-244.5	11.8	-3.6
Eh	mV	85 0	854.0	99.2	80.4	108.2	302 3	101.4	148.9	70.6	104.8	68.1	108.1	-44.5	211 8	196.4
pH	SU	7.43	7.37	7.1	7.24	7.44	7.02	7.25	7 19	7 38	7.48	7.39	7.63	7.4	7.15	7.66
Spec f c Conductance	uS/cm	1525	1734	1568	171.9	2251	1950	1488	1244	1337	1235	1463	2077	1380	1060	890
Temperature	deg C	15.29	16.16	15.77	15	14.8	14.4	15.62	16.5	16.6	15.2	15.2	16.55	16.1	13.6	15.05
Turb dity	NTU	4.09	2.48	0.62	0.92	0.58	2.11	2.35	1 86	3.45	3.76	3.88	3.55	4.86	3.61	2.68

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW18																	GAMW18B				
Sample Date		2016-07-13	2016-09-08	2016-11-09		2017-01-10	2017-03-01	2017-04-26	2017-07-12		2017-08-23	2017-10-03		2018-03-14	2018-04-23	2018-10-25	2019-04-29	2019-11-07	2018-09-10	2018-10-25		2019-04-29	2019-11-07
Samp e Type		N	N	FD	N	N	N	N	FD	N	N	FD	N	N	N	N	N	N	N	FD	N	N	N
Chemical Name	Un t																						
CCR Appendix I I I																							
Boron	mg/L	1.8	3.5	1.9	1.8	1.3	1	0.77	1.2	1.2	1.5	1.9	1.9		1.2	1.7	0.95	1.7	13	12	13	14	11
Ca cium	mg/L	320	610	370	360	330	280	210	280	290	300	380 J	64 J		320	230	320	360	260	200	220	240	180
Ch oride	mg/L	17	39	17	17	9.3	5	4.3	10	10	11	23	23		7.3	22	12	27	150	140	140	170	140
Fluoride	mg/L	0.047 J	0 036 J	10 U	10 U	5 U	5 U	2 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	0 057	0.074	0.15	0.77 J	0.74	0 73	0.88	0.99
pH	SU	6.95	6.83		6.7	6.88	7 11	6.6		6.96	7.02		6.91	7.2	7.21	6.54	6.71	7.18	7.73		6.86	7.15	7.68
Su fate	mg/L	760 J-	1400	850	830	640	540	370	600	610	690	960	950		670	550	780	920	1100	1000	1100	1100	840
Total Dissolved Solids	mg/L	1300	2200	1500	1500	1200	1000	730	1100	1100	1300	1600	1500		2400	1100	1400	1500	2100	2000	2000	2100	1500
CCR Appendix IV																							
Ant mony	mg/L	0.002 U	0.002 U	0.00096 J	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0014 J	0.0023 J	0.0014 J	0.00091 J	0 0014 J	0.005 U	0.0015 J	0.0021 J	0.0021 J	0.0011 J			0.005 U		0.005 U	0.00079 J	0.005 U	0.0018 J	0.0026 J	0.0028 J	0.0037 J	0.0041 J
Barium	mg/L	0.038	0.047	0.041	0.039	0.037	0.024	0.021	0.051	0.052	0.055			0.048	0.035	0.037	0.039	0.05	0.048	0.035	0.039	0.039	0.024
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.00094 U	0.001 U	0 001 U	0.001 U	0.001 U	0.00053 U	0.001 U
Cadmium	mg/L	8 1E-05 J	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.00067 J	0.00046 J	0 0005 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.00023 J	0.00047 J	0.0002 J	0.00024 J	0.001 U	0.00023 J	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.00028 J	0 001 U	0.00027 J	0.00026 J	0.00028 J	0 00024 J	0 00024 J
Fluoride	mg/L	0.047 J	0 036 J	10 U	10 U	5 U	5 U	2 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	0 057	0.074	0.15	0.77 J	0.74	0 73	0.88	0.99
Lead	mg/L	0.001 U	0.001 U	0.00051 J	0.00025 J	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.00067 J		0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U
L thium	mg/L	0 00096 J	0.008 U	0.008 U	0.008 U	0.00042 J	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U			0.008 U		0.008 U	0.008 U	0.008 U	0.025	0.015	0.016	0.023	0.015
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ			0 0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0 11	0.18	0.14	0.13	0.094	0.1	0.1	0.1	0.11	0.1			0.097	0.085	0 057	0.062	0.076	0.024	0.014	0.015	0.026	0.011
Radium Total	pci/L	5 U	0.803	0.474	0.449	0 581 U	0.398 U	0.384 U	0.493	0.337 U	0 629			0.373 U	0 259	0.477	0.365 U		1.7	1.28	1.46		
Radium-226	pci/L	1 U	0.348	0.334 U	0.33 U	0.325	0.13	0.131 U	0.166 J	0.179 J	0.332			0.111	0.0715	0 291	0.325 U		0.773 J	0.717	0.748	0.41	
Radium-228	pci/L	1 U	0.49 U	0.455 U	0.413 U	0 581 U	0.398 U	0.384 U	0.381 U	0.337 U	0.369 U			0.373 U	0.187	0.357 U	0.365 U		0.928	0.562	0.708	0.941	
Selenium	mg/L	0 01	0.018	0.0065	0.0052	0.0099	0.011	0.0053	0.012	0.012	0 006			0.009	0.0084	0 015	0.015	0.012	0 005 U	0.005 U	0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U
Supplemental Parameters																							
Alkal nity Bicarbonate (HCO3)	mg/L																		230				
Alkal nity Carbonate (CO3)	mg/L																		5 U				
Alkal nity Hydrox de (OH)	mg/L																		5 U				
Alkal nity Total	mg/L															240	190	250	230		230	210	200
Ferr c Iron	mg/L															0.032 J			6.8 J		2.9		
Ferrous Iron	mg/L															0.05 UJ			0.1 R		1.3 J		
Iron	mg/L																0.16 J	0.083 J				3.6	3
Magnesium	mg/L															16	17	23	66		58	67	51
Manganese	mg/L																0.0047 J	0.014 J				0.69	0 66
Nitrate as N	mg/L																0.19	0.51	0 05 UJ			0.1 U	0.1 U
Nitrite as N	mg/L																		0 05 UJ				
Nitrogen Nitrate-Nitrite	mg/L															0.55					0.05 U		
Phosphorus (as phosphate)	mg/L															0.31 U	0.14 J	0.31 UJ	0 031 U		0.31 U	0.31 U	0.31 UJ
Potassium	mg/L															3.4 J	2 J	3.7 J	7.3		5.7	7.8	4.4 J
Sodium	mg/L															28	24	39	260		240	260	180
Sample Parameters																							
Dissolved Oxygen	mg/L	4.83	4.77		5.93	7.52	8 86	7.79		6.04	4.52		5 32	6.5	8.49	3.78	7.01	2.95	0.24		0.29	0.92	0.36
Oxidation Reduction Potential	mV	98.9	76.8		28.7	106.8	97.9	209.2		203.2	24.7		121.9	-129 6	-51.6	-36.6	129.2	-41.1	-140.7		-103.4	109.2	-144.8
Eh	mV	298.9	276.8		228.7	306.8	297.9	409.2	200.0	403.2	224.7		321.9	70.4	148.4	163.4	329.2	158.9	59.3		96.6	309.2	55.2
pH	SU	6.95	6.83		6.7	6.88	7 11	6.6		6.96	7.02		6.91	7.2	7.21	6.54	6.71	7.18	7.73		6.86	7.15	7.68
Spec f c Conductance	uS/cm	1474	2362		1740	1255	986	970		1299	1414		1760	905	1170	1230	1060	1338	3311		2147	1902	1475
Temperature	deg C	16 3	20.1		16 6	9.65	8.47	11.2		17.9	19.8		19.3	8.1	8.9	17.4	8 8	14.2	15.39		14.9	11.8	13.7
Turb dity	NTU	3.32	1.63		2.38	3.05	4.44	2.48		1.71	1.03		4 16	4.59	0.71	1.29	4.55	2.04	2.78		3.58	3 21	3.14

Notes:
CCR = coal combustion res dual
mg/L = m ligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW46								GAMW46B								GAMW52					
Sample Date		2018-06-13	2019-03-01	2019-04-17	2019-06-06	2019-07-18	2019-08-26	2019-10-04	2019-11-19	2018-06-13	2019-03-04	2019-04-17	2019-06-07	2019-07-18	2019-08-26	2019-10-04	2019-11-19	2018-09-10	2018-10-31		2019-05-09	2019-11-14	
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	FD	N	N	FD	N
Chemical Name	Un t																						
CCR Appendix I I I																							
Boron	mg/L	0.055 J	0.1 U	0.033 J	0.1 U	0.032 J	0.053 J	0.043 J	0.049 J	0.05 J	0.05 J	0.037 J	0.047 J	0.03 J	0.05 J	0.047 J	0.046 J	0.34		0.17	0.077 J		0.13
Ca cium	mg/L	56	14	28	25 J-	25	25	23	27	25	58	58	56	52	58	49	56	75		59	52		72
Ch oride	mg/L	8.4	2.4	1.9		1 8	1.6	1.6	1.6	3	7.9	7.9		7 2	8	7.1	6.9	34		9.1	5.5		37
Fluoride	mg/L	0.052 J	0.068	0.063		0 065	0.06	0 079 J	0.062	0 048 J	0.066	0.076		0.072	0.069	0.073 J	0.072	0.36 J		0.3	0.25 J		0.3
pH	SU	7.93	8.17	8.23	7.52	8.15	7.9	7.81	7.77	8.2	7.11	7.99	7.58	8.18	7.62	7.44	7.47	7.5		7.06	7.17		7.59
Su fate	mg/L	55	34	30		28	29	30	27	29	64	64		64	68	65	64	86		39	24		67
Total Dissolved Solids	mg/L	260	160	150		130	150	140 J	140	150	260	290		240	220 J	250	240	400		250	240		350
CCR Appendix IV																							
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U		0 002 U	0.002 U		0.002 U
Arsenic	mg/L	0.0014 J	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.00086 J	0.005 U	0.0015 J	0.0012 J	0.00076 J	0.005 U	0.00091 J	0.00095 J	0.0013 J	0.001 J	0.005 U		0 005 U	0.005 U		0 005 U
Barium	mg/L	0.027	0.0028 J	0.0059	0.0065	0.0054	0.0054	0 0049 J	0.0059	0.0086	0.027	0.026	0.025	0.023	0.024	0.021	0.025	0.039		0.019	0.015		0.02
Beryllium	mg/L	0.001 U	0.005 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00054 J	0.001 U	0.001 U	0 0011	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.0011	0.001 U		0 001 U	0.001 U		0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.00024 J	0.001 U		0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.0014 J	0 002 U	0.002 U	0.0021	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0 002 U	0.002 U		0 002 U	0.002 U		0.002 U
Cobalt	mg/L	0.0002 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 00034 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.00058 J		0.00031 J	0.001 U		0.001 U
Fluoride	mg/L	0.052 J	0.068	0.063		0 065	0.06	0 079 J	0.062	0 048 J	0.066	0.076		0.072	0.069	0.073 J	0.072	0.36 J		0.3	0.25 J		0.3
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0 001 U	0.001 U		0.001 U
L thium	mg/L	0.008 U	0 04 U	0.008 U	0.008 U	0.008 U	0 008 U	0 008 U	0.008 U	0.008 U	0.0017 J	0.008 U	0.008 U	0.002 J	0.008 U	0 008 U	0 003 J	0.0017 J		0 008 U	0.008 U		0.0025 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U		0.0002 U
Molybdenum	mg/L	0.0031 J	0 01	0.01 U	0.01 U	0.01 U	0 01 U	0 0015 J	0.01 U	0.0018 J	0.0024 J	0.0022 J	0.0025 J	0.0028 J	0.0028 J	0.0025 J	0.003 J	0.005 J		0.0035 J	0.0016 J		0.0017 J
Radium Total	pci/L	0.384 U	0.486 U	0.33 U		0.427 U	0.505 U	0.566		0.392 U	0.402 U	0.308 U		0.427 U	0.609 U	0.408 U		0.796		1 J	0.53 U		
Radium-226	pci/L	0.244 U	0.103 U	0.0708 U		0.214 U	0.0925 UJ	0 179 J		0.223 U	0.286	0.108		0.232 U	0.105 UJ	0.192 J		0.46 J		0 299 J	0.436		
Radium-228	pci/L	0.384 U	0.486 U	0.33 U		0.427 U	0.505 UJ	0.481 U		0.392 U	0.402 U	0.308 U		0.427 U	0.609 UJ	0.408 U		0.392 U		0 706 J	0.53 U		
Selenium	mg/L	0.001 J	0.025 U	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U	0.0017 J	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0 005 U	0.0014 J		0.0017 J	0.0014 J		0.0011 J
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00059 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00068 J	0.001 U		0 001 U	0.001 U		0.001 U
Supplemental Parameters																							
Alkal nity Bicarbonate (HCO3)	mg/L																	210					
Alkal nity Carbonate (CO3)	mg/L																	5 U					
Alkal nity Hydrox de (OH)	mg/L																	5 U					
Alkal nity Total	mg/L			82					73			140					130	210	180	190	170	190	190
Ferr c Iron	mg/L																	0.2 J	0.1 U	0.1 U			
Ferrous Iron	mg/L																	0.1 R	0 05 J	0.05 UJ			
Iron	mg/L			0.054 J					0 2 U			1.5					1.6				0.2 U	0.2 U	0.2 U
Magnesium	mg/L			9.7					7.8			15					14	20	16	15	16	20	21
Manganese	mg/L			0.0066 J					0.015 U			0.26					0.23				0.0022 J	0.017	0.02
Nitrate as N	mg/L			0.58					0.48			0.1 U					0.1 U	1 J			1.9	1.1	1.1
Nitrite as N	mg/L																	0.089 J					
Nitrogen Nitrate-Nitrite	mg/L																		1.3	1.3			
Phosphorus (as phosphate)	mg/L			0.16 J					0.31 U			0.15 J					0.31 U	0.031 U	0.31 U	0.31 U	0.31 U	0.31 U	0.31 U
Potassium	mg/L			0.97 J					1 J			0.83 J					0.82 J	4.7	3 J	2.9 J	2.1 J	3.1 J	3.3 J
Sodium	mg/L			4.6 J					2.4 J			5.4					4.6 J	25	13	13	9 8	18	21
Sample Parameters																							
Dissolved Oxygen	mg/L	0.12	1.85	4.18	6.44	6.58	4.03	2.44	3 36	3 59	0.08	1.9	0.3	1.4	1.25	0.31	0.3	0.48		0.21	6.42		2 2
Oxidation Reduction Potential	mV	-171.4	1.9	7.7	157.6	25.5	40.6	9.16	-141.1	-29.4	111.9	-111.1	-133.1	-93.9	-119.9	33.7	-229.6	-30.3		85.1	108.2		-43 2
Eh	mV	28 6	201.9	207.7	357.6	225.5	240.6	209.2	58.9	170.6	311.9	88.9	66.9	106.1	80.1	233.7	-29.6	169.7		285.1	308.2	200.0	156.8
pH	SU	7.93	8.17	8.23	7.52	8.15	7.9	7.81	7.77	8.2	7.11	7.99	7.58	8.18	7.62	7.44	7.47	7.5		7.06	7.17		7.59
Spec f c Conductance	uS/cm	367	155	161	179	153	153	152	132	211	268	294	282	274	284	260	242	0.896		448	308		320
Temperature	deg C	11.4	8	9.1	11.1	13.2	14.2	14.8	11.7	11.3	9.6	10.8	11	11.9	12.3	12.3	11 3	19.97		17.6	14.2		15.3
Turb dity	NTU	3.96	1.91	1.33	0.51	0.82	0.69	0.89	0 66	3.45	3.26	4.3	3.25	3.11	1.15	4.16	2.84	0.45		0.83	0.42		0.74

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.
UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW52B				GAMW53				GAMW53B					GAMW54				GAMW54B				
Sample Date		2018-09-11	2018-10-31	2019-05-09	2019-11-14	2018-09-11	2018-10-30	2019-04-30	2019-11-14	2018-09-11	2018-10-30		2019-04-30	2019-11-14	2018-09-10	2018-10-31	2019-04-30	2019-11-14	2018-09-10	2018-10-31		2019-05-01	2019-11-15
Samp e Type		N	N	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	N	N	FD	N	N	N
Chemical Name	Un t																						
CCR Appendix I I I																							
Boron	mg/L	0 75	0.8	1	1.3	0.19	0.25	0.056 J	0.13	2.5		3.1	2 2	0.73	0.84	0.77	0.39	0 37	5.6		6.5	5.9	6
Ca cium	mg/L	160	160	110	130	45	53	17	25	180		190	150	140	93	88	93	81	210		220	200	240
Ch oride	mg/L	530	470	380	370	4.9	4.6	1.9	3.6	90		85	81	74	15	10	10	4	100		95	110	120
Fluoride	mg/L	10 U	0.18	0 21 J	0.23	0.17 J	0.17	0.05 U	0.05 U	0.52 J		0.46	0.51	0.7	0 18 J	0.17	0.14	0 28	0.41 J		0.52	0.59	0.58
pH	SU	8.3	7.1	7.42	7.34	6	6.47	5.93	6 21	7.3		7.35	7.41	7.52	6.24	7.92	6 82	7.08	6.95		8.71	7.27	7.2
Su fate	mg/L	210	190	220	290	51	56	37	36	430		510	340	320	190	150	190	76	750		730	710	720
Total Dissolved Solids	mg/L	1500	1300	1100	1100	240	250	130	160	1100		1100	900	770	500	400	470	350	1600		1400	1500	1400
CCR Appendix IV																							
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.00061 J	0.002 U		0.002 U	0.002 U	0.002 U	0 0011 J	0.00074 J	0 00078 J	0.001 J	0.002 U		0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0013 J	0.0016 J	0.00083 J	0.0012 J	0.013	0.015	0.00097 J	0.0018 J	0 00079 J		0.00083 J	0.001 J	0.0016 J	0 0024 J	0.0028 J	0.0022 J	0.0045 J	0.0025 J		0.0032 J	0.0045 J	0.005
Barium	mg/L	0 32	0 31	0.25	0.28	0 027	0.028	0.019	0.026	0.052		0.054	0 044	0.072	0.043	0.039	0.031	0.031	0.098		0.093	0.08	0.084
Beryllium	mg/L	0.001 U	0.00042 J	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0.001 U	0.00059 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001 U	0.00029 J	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.0019 J	0.0018 J	0 0012 J	0.002 U	0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.00032 J	0.001 U	0.001 U	0.00084 J	0.00099 J	0 0005 J	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U	0.00053 J	0.00052 J	0 00062 J	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
Fluoride	mg/L	10 U	0.18	0 21 J	0.23	0.17 J	0.17	0.05 U	0.05 U	0.52 J		0.46	0.51	0.7	0 18 J	0.17	0.14	0 28	0.41 J		0.52	0.59	0.58
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.0014	0.00089 J	0.00057 J	0.00063 J	0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0041 J	0.0031 J	0.0033 J	0.0071 J	0.008 U	0.008 U	0 008 U	0.0021 J	0.0042 J		0.0052 J	0.005 J	0.0066 J	0.008 U	0.008 U	0.008 U	0.0023 J	0.0048 J		0.0036 J	0.0048 J	0.0074 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U		0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.014	0.015	0.0095 J	0.0086 J	0 012	0.015	0 0051 J	0.011	0.0083 J		0.0075 J	0.0098 J	0.02	0.043	0.044	0.023	0 03	0.018		0.019	0 0085 J	0.012
Radium Total	pci/L	3 52	5.55 J	2.63		0.547 U	1.45 J	0 344 U		1.69		0.48 J	1.26		0.5	1.08 J	0.393 U		2 03		2.7 J	1.82	
Radium-226	pci/L	2 11	2.76 J	1.2		0.257	0.795 J	0 316 U		0.789		0 238 J	0 544		0.385 J	0 237 J	0.337 U		1 18 J		1.35 J	0.956	
Radium-228	pci/L	1.41	2.79 J	1.44		0.547 U	0.658 J	0 344 U		0.897		0.347 U	0.719		0.385 U	0 843 J	0.393 U		0.849		1.35 J	0.865	
Selenium	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U	0.005 U		0.005 U	0.005 U	0.005 U	0 0017 J	0.0012 J	0.0043 J	0.0035 J	0.005 U		0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0.001 U	0.00049 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
Supplemental Parameters																							
Alkal nity Bicarbonate (HCO3)	mg/L	220				120				250					150				240				
Alkal nity Carbonate (CO3)	mg/L	5 U				5 U				5 U					5 U				5 U				
Alkal nity Hydrox de (OH)	mg/L	5 U				5 U				5 U					5 U				5 U				
Alkal nity Total	mg/L	220	230	220	200	120	140	53	73	250	240	250	260	190	150	160	160	230	240	230	230	250	260
Ferr c Iron	mg/L	5 J	3.4			2 J	1			3.2 J	2 3	2.7			0 13 J	0.14			5.9 J	4.5	3.4		
Ferrous Iron	mg/L	0.1 R	0.32 J			0 1 R	0.5 J			0.1 R	0 56 J	1 J			0.1 R	0 029 J			0.1 R	0.94 J	1.6 J		
Iron	mg/L			2.7	2.5			0.25	0.28				3 1	2.4			0.14 J	0 31				5.4	5.4
Magnesium	mg/L	37	38	30	28	15	15	8.9	11	23	24	25	23	19	19	18	21	17	38	38	36	42	46
Manganese	mg/L			0.21	0.25			0 0079 J	0.015 U				0.4	0.32			0 0097 J	0.015 U				0.48	0.51
Nitrate as N	mg/L	0.05 UJ		0 1 U	0.1 U	1.3 J		1.4	0.4	0.05 UJ			0.1 U	0.1 U	0.028 J		0.49	0 15	0.05 UJ			0.1 U	0 1 U
Nitrite as N	mg/L	0.05 UJ				0.03 J				0.05 UJ					0 05 UJ				0.05 UJ				
Nitrogen Nitrate-Nitrite	mg/L		0.052				0.05 U				0.099	0.74 J-				0.21				0.15	0.091		
Phosphorus (as phosphate)	mg/L	0.056	0.21 J	0.31 U	0.11 J	0.32	0.31 U	0.31 U	0.31 U	0.031 U	0.14 J	0.52	0.31 U	0.31 U	0.031 U	0.31 U	0.11 J	0.31 U	0.079	0.31 U	0.39	0.38	0.3 J
Potassium	mg/L	6	6.4	7	6.5	2 2	5 U	1.3 J	1.6 J	4.6	5 2	5.4	4.9 J	4.5 J	1.9	1.8 J	1.2 J	1.6 J	6.8	6.8	6.2	6 3	5.6
Sodium	mg/L	220	250	250	210	6 5	7.8	4.9 J	3.9 J	120	130	130	99	75	21	21	15	11	200	200	180	160	140
Sample Parameters																							
Dissolved Oxygen	mg/L	0.44	0.1	0.15	0.19	0.53	0.86	3.11	0 84	0 26		0.8	0.36	0.09	0.61	1.41	0.72	0.26	0.42		2.12	0.42	0.31
Oxidation Reduction Potential	mV	-214.9	-103.5	6.31	-102.9	-24 6	-199.5	43.7	-54.8	-183.2		-168	27.7	-75 3	107 8	-294.7	48.4	-69.5	-123.4		-315.7	-23.1	-43.3
Eh	mV	-14.9	96.5	206.3	97.1	175.4	0.5	243.7	145.2	16.8		32.0	227.7	124 7	307 8	-94.7	248.4	130.5	76.6	200.0	-115.7	176.9	156.7
pH	SU	8.3	7.1	7.42	7.34	6	6.47	5.93	6.21	7.3		7.35	7.41	7.52	6.24	7.92	6 82	7.08	6.95		8.71	7.27	7.2
Spec f c Conductance	uS/cm	1934	2005	1652	1353	307	400	125	155	1354		1620	1160	870	675	630	493	374	1816		1983	1636	1310
Temperature	deg C	17.26	16.6	15.3	16.1	21.3	20.1	11.4	17.5	20.89		20.4	18.7	19.7	21.2	18.53	10.5	15 3	17.6		17.29	15.5	15.8
Turb dity	NTU	1.6	0.88	2.35	1.01	9.93	5.17	4.76	4.8	2.43		3	3.45	2 5	2.03	1	3 24	2.31	4.2		1.64	4.49	1.67

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW55				GAMW55R	GAMW55B					GAMW56				GAMW56B			
Sample Date		2018-09-10		2018-10-29		2019-11-15	2018-09-11		2018-10-29	2019-05-01	2019-11-15	2018-09-11	2018-10-26	2019-04-29	2019-11-15	2018-09-11	2018-10-29	2019-04-29	2019-11-15
Samp e Type		FD	N	FD	N	N	FD	N	N	N	N	N	N	N	N	N	N	N	N
Chemical Name	Un t																		
CCR Appendix I I I																			
Boron	mg/L	1.9	1.9	1.8	1.8	1.1	7.1	7.4	8 2	9.1	11	0.26	0 28	0 21	0.2	1.2	1 2	2.3	3.2
Ca cium	mg/L	260	250	270	260	180	250	250	260	210	210	130	110	91	120	140	140	150	150
Ch oride	mg/L	58	59	69	70	61	220	220	190	170	150	3.1	2.4	3.2	2.1	50	36	55	64
Fluoride	mg/L	0 51 J	0.52 J	0.47	0.47	0 62	0 29 J	10 U	0.25	0.31	0.31	1.2 J	0.99	0 53	0.71	0.41 J	0.33	0.4	0.44
pH	SU		6.77		7.04	7.46	7.31		7.07	7.19	7.31	6 82	7.17	6.83	7.06	6.95	6.91	7.08	7.21
Su fate	mg/L	590	600	630	620	480	820	820	910	790	750	57	63	54	56	170	130	260	360
Total Dissolved Solids	mg/L	1200	1300	1300	1300	950	1800	1900	1800	1700	1400	470	480	420	440	740	690	830	860
CCR Appendix IV																			
Ant mony	mg/L	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002	0 002 U
Arsenic	mg/L	0.00083 J	0.005 U	0.005 U	0.005 U	0.005 U	0 0014 J	0.0011 J	0.005 U	0.005 U	0.005 U	0.019	0.022	0.011	0.0097	0.005 U	0.005 U	0.005	0 005 U
Barium	mg/L	0 099	0.097	0.068	0.069	0.035	0.14	0.14	0.12	0.074	0.067	0.068	0.049	0.044	0.04	0.076	0 072	0.082	0.076
Beryllium	mg/L	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001	0 001 U
Cadmium	mg/L	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001	0 001 U
Chromium	mg/L	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002	0 002 U
Cobalt	mg/L	0.0065	0.0058	0.0044	0.0044	0.001 U	0.00034 J	0.00028 J	0.001 U	0.001 U	0.001 U	0.0017	0 0053	0.0084	0.0081	0.001 U	0.001 U	0.001	0 001 U
Fluoride	mg/L	0 51 J	0.52 J	0.47	0.47	0 62	0 29 J	10 U	0.25	0.31	0.31	1.2 J	0.99	0 53	0.71	0.41 J	0.33	0.4	0.44
Lead	mg/L	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001	0 001 U
L thium	mg/L	0.0021 J	0.0017 J	0.008 U	0.008 U	0.0035 J	0 0064 J	0.0064 J	0.0054 J	0 0055 J	0.0078 J	0.0034 J	0.0039 J	0.0023 J	0.0053 J	0.0051 J	0.0035 J	0.0044	0 0062 J
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002	0.0002 U
Molybdenum	mg/L	0.03	0.028	0.026	0.026	0.024	0 0057 J	0.0055 J	0.0055 J	0 0046 J	0.005 J	0.013	0.0094 J	0.0072 J	0.0079 J	0.004 J	0.003 J	0.0031	0 0064 J
Radium Total	pci/L	1.4	0.802	0.922 J	1.24 J		3.35	3.18	3.66 J	2.08		0.728	0.698 J			1.26	1.28 J		
Radium-226	pci/L	0.574 J	0.474 J	0.363 J	0.447 J		1.72	1.75	1.86 J	1.15		0.504	0.357 J	0.334 U		0.763	0.578 J	0.506	
Radium-228	pci/L	0 824	0.403 U	0.559 J	0.796 J		1.63	1.43	1.79 J	0.926		0.371 U	0.429 U	0.373 U		0.493	0.698 J	0.571	
Selenium	mg/L	0.0037 J	0.0031 J	0.0027 J	0.0027 J	0.0046 J	0 005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005	0 005 U
Thallium	mg/L	0.00021 J	0.001 U	0.00023 J	0.00022 J	0.00022 J	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001	0 001 U
Supplemental Parameters																			
Alkal nity Bicarbonate (HCO3)	mg/L		240					230				370				370			
Alkal nity Carbonate (CO3)	mg/L		5 U					5 U				5 U				5 U			
Alkal nity Hydrox de (OH)	mg/L		5 U					5 U				5 U				5 U			
Alkal nity Total	mg/L		240		240	230		230	220	230	230	370	370	300	330	370	410	330	270
Ferr c Iron	mg/L		0.65 J		0.19			5.2 J	2 5			13 J	5.5			6.4 J	3.5		
Ferrous Iron	mg/L		0.1 R		0 058 J			0.1 R	2.8 J			0.1 R	6.5 J			0.1 R	1.7 J		
Iron	mg/L					0.044 J				4.2	4.1			10	3.9			5.7	4.3
Magnesium	mg/L		32		39	28		46	51	50	42	24	25	27	24	37	38	40	38
Manganese	mg/L					0.22				0.58	0.46			0.25	0.45			0 33	0.29
Nitrate as N	mg/L		0.68 J			1.4		0.05 UJ		0.1 U	0.1 U	0.05 UJ		1.5	0.13	0.05 UJ		0.1 U	0.1 U
Nitrite as N	mg/L		0.058 J					0.05 UJ				0.05 UJ				0.05 UJ			
Nitrogen Nitrate-Nitrite	mg/L				0.44				0.05 U				0.062				0.05 U		
Phosphorus (as phosphate)	mg/L		0.031 U		0 31 U	0.31 U		2.1	0.7	0.31 U	0.16 J	0.031 U	0.31 U	0.12 J	0.31 U	0.045	0.15 J	0.14 J	0.31 U
Potassium	mg/L		8.3		9.5	7.2		6	6 6	6.2	4.8 J	2.6	2.4 J	1.6 J	1.9 J	3.3	3.6 J	3 7 J	3.6 J
Sodium	mg/L		58		72	79		200	230	200	180	11	12	6.3	5.5	50	49	58	62
Sample Parameters																			
Dissolved Oxygen	mg/L		1.73		0.33	0.17	0.72		0.37	0.17	0.11	0.99	0.28	1.3	0.34	0.29	0.26	0.79	0.18
Oxidation Reduction Potential	mV		21.6		-69.4	-137.9	-28.9		-129.5	-115.9	-57.5	-97.4	-95.4	64	-86.6	-102.8	-44.4	31.8	-105.7
Eh	mV		221.6	200.0	130.6	62.1	171.1		70.5	84.1	142.5	102.6	104.6	264.0	113.4	97.2	155.6	231.8	94 3
pH	SU		6.77		7.04	7.46	7.31		7.07	7.19	7.31	6 82	7.17	6.83	7.06	6.95	6.91	7.08	7.21
Spec f c Conductance	uS/cm		1493		1574	1491	1017		2109	2201	1967	749	835	460	466	928	1036	856	741
Temperature	deg C		21.1		19.4	17.9	16.7		19.2	18.5	18.1	17	15.7	8.7	14	13.9	13.8	11.6	12.9
Turb dity	NTU		1.74		0.66	3.92	2.26		4.38	1.74	4.77	2.91	2.99	2.31	2.01	2.96	1.45	4.77	1.4

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nepheloметric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.
UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Prepared by: DFSC
Checked by: KMC
Rev ewed by MAH

Appendix A-2: Porewater Analytical Data
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

SYS_LOC_CODE		DAPZ-02A	DAPZ-02B	GAPIEZ06	GAPIEZ06	GAPIEZ06
SAMPLE_DATE_yyyy-MM-dd		2020-03-03	2020-03-03	2018-08-09	2018-09-13	2018-10-31
FRACTION		T	T	D	T	T
Chemical Name	Unit					
CCR Appendix III						
Boron	mg/L	7.4	13.8	9.6	8.6	8.3
Calcium	mg/L	489	175	210	210	210
Chloride	mg/L	21.9	119	56	58	55
Fluoride	mg/L	0.16	0.72	0.91	1.1 J	0.92
pH	SU	7.33	7.62	7.51	7.43	9.37
Sulfate	mg/L	1760	2420	750	720	740
Total Dissolved Solids	mg/L	2810	3830		1300	1300
CCR Appendix IV						
Antimony	mg/L	0.001 U	0.001 U	0.0014 J	0.002 U	0.002 U
Arsenic	mg/L	0.001 U	0.0018	0.011	0.011	0.012
Barium	mg/L	0.028	0.033	0.03	0.029	0.03
Beryllium	mg/L	0.0002 U	0.0002 U	0.001 U	0.00052 J	0.001 U
Cadmium	mg/L	0.00052	0.0002 U	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.0038	0.0023 J+	0.002 U	0.002 U
Cobalt	mg/L	0.0022	0.001 U	0.0004 J	0.00029 J	0.001 U
Fluoride	mg/L	0.16	0.72	0.91	1.1 J	0.92
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.016	0.0041 J	0.0038 J	0.0033 J
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.81	0.063	0.079	0.094	0.11
Selenium	mg/L	0.011	0.001 U	0.001 J	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Supplemental Parameters						
Alkalinity, Bicarbonate (HCO3)	mg/L				170	
Alkalinity, Carbonate (CO3)	mg/L				5 U	
Alkalinity, Hydroxide (OH)	mg/L				5 U	
Alkalinity, Total	mg/L	99.6	224	170	170	160
Ferric Iron	mg/L			2.8 J	2.7 J	0.19
Ferrous Iron	mg/L			0.1 U	0.1 R	0.088 J
Iron	mg/L	0.61	14.2			
Magnesium	mg/L	48.9	18.4	53	51	45
Manganese	mg/L	0.12	0.7			
Nitrate	mg/L			0.031 J		
Nitrate as N	mg/L	0.75 J+	0.1 U		0.05 U	
Nitrite as N	mg/L				0.05 U	
Nitrogen, Nitrate-Nitrite	mg/L					0.038 J
Phosphorus (as phosphate)	mg/L			0.031 U	0.028 J	0.12 J
Potassium	mg/L	59.1	17.5	3.9 J	4.1	5 U
Sodium	mg/L	286	1050	100	110	99
Field Parameters						
Dissolved Oxygen	mg/L	0.61	0.00	1.33	0.7	0.80
Oxidation-Reduction Potential	mV	66.9	-197.4	-130 8	-118 2	-261
Eh	mV	266.9	2.6	69.2	81.8	-61
pH	SU	7.33	7.62	7.51	7.43	9.37
Specific Conductance	uS/cm	3025	4772	1518	1371	1672
Temperature	deg C	9.4	11.7	15.91	16.1	15.1
Turbidity	NTU	28.9	2.74	3.73	4.29	3.4

Notes:
CCR= coal combustion residual
mg/L = milligrams per liter
mV= millivolts
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
"U" = Indicates he result was not detected above the method detection limit (MDL) for the sample; he quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J+" = Indicates the result is estimated and may be biased high.
"R"= Indicates the result was rejected during data validation.

Prepared by: DFSC
Checked by: KMC
Reviewed by: MAH

APPENDIX B

Groundwater Flow Model Technical Memorandum

TECHNICAL MEMORANDUM

DATE November 12, 2020

TO Danielle Sylvia Cofelice, PE and PJ Nolan, Ph.D.

CC Mark Haney, Joe Gormley, and Rens Verburg

FROM: Ross Bennett, PE(NH) and Brandon Poiencot, PE

GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM

R.M. SCHAHFER GENERATING STATION

1.0 GROUNDWATER MODELING

This Memorandum presents Golder's summary of groundwater modeling activities associated with the evaluation of hydrogeologic conditions and potential remedial designs at the R.M. Schahfer Generating Station in Wheatfield, Indiana (the Site).

A steady state groundwater flow model was developed and calibrated. This memorandum includes the following to document development of the groundwater flow model and includes:

1) Objectives;
2) Groundwater Flow Model Development
3) Model selection (numerical);
4) Model Geometry
5) Boundary Conditions
6) Input Parameters
7) Model Calibration and Verification
8) Parameter Sensitivity analysis
9) Design Simulations
10) Summary

The conceptual model (including geology, hydrology, lithology and analytical data) used to support numerical model development is described Section 2.0 of the CCR Assessment of Corrective Measures Report (Golder, 2019).

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1.1 Objectives

The primary objective of the modeling was to simulate the groundwater flow conditions in the area surrounding R.M. Schahfer Generating Station to support evaluation of the remedy design including the feasibility of Monitored Natural Attenuation (MNA) as part of the assessment of corrective measures process for the Coal Combustion Residuals (CCR) surface impoundments for the Site.

The general scope of the groundwater modeling is to:

- Simulate the groundwater flow regimes on Site;
- Predict the travel times and flow paths of unattenuated particles originating at areas impacted by metals contamination;
- Inform remedy design (e.g., groundwater pump and treat design);
- Inform the groundwater monitored natural attenuation study.

2.0 GROUNDWATER FLOW MODEL DEVELOPMENT

2.1 Numerical Implementation

Golder developed the groundwater flow model for the site using the USGS MODFLOW-2005 Modular Three-Dimensional Finite-Difference Groundwater Flow Model (Harbaugh, 2005). The pre- and post-processing software used for the modeling was Groundwater Vistas (Vistas) Version 7.24 (Environmental Simulations Inc.).

Development of a numerical groundwater flow model involved the following steps:

- Definition of the model geometry including lateral and vertical extent, number and thickness of model layers, and grid spacing
- Definition and placement of model boundary conditions
- Selection of input parameters such as hydraulic conductivity (horizontal and vertical) and precipitation recharge

The following sections describe the steps used to develop the model.

2.2 Model Geometry

The finite-difference model grid location is shown on Attachment A**.** The model area (excluding no-flow cells) is approximately 10,800 feet (along x-axis) by 12,300 feet (along y-axis) at the widest points. The southwest corner of the model grid (model coordinates 0, 0) corresponds with Site coordinates 2165530.5N and 2962863.0 W (Indiana State Plane West). The model grid is oriented parallel with cardinal directions. The model grid contains 504 rows and 432 columns. The grid cell size in the XY direction is uniform, at 25 feet by 25 feet across the entire model domain. Based on geologic and hydrogeologic conditions discussed in Section 2.0 of the CCR Assessment of Corrective Measures Report (Golder, 2019), the model utilizes three layers, with the lowermost layer representing the medium to coarse sand and the upper two layers representing the fine sands. Layers 1 and 2 have the same hydraulic properties, but they were divided to focus boundary condition cells in the upper portion of the aquifer using Layer 1. The base of Layer 3 is the top of the shale bedrock surface and ranges from 597 to 624

feet mean sea level (MSL). The surface topography is based on publicly available lidar data and ranges from 646 to 723 feet MSL. A cross section of model geometry along model column 200 is shown on Attachment B.

2.3 Model Boundary Conditions

Boundary conditions in groundwater models consist of physical and hydraulic boundaries within the model area. Physical boundary conditions are well-defined geologic and hydrologic features that influence groundwater flow patterns. The following sections describe the boundary conditions used in the model.

2.3.1 Constant Head Boundaries

Constant head boundaries (CHB) were assigned along an unnamed stream in Layer 1 in the southwestern corner of the model to recreate the approximate constant hydraulic heads where long-term average stream water levels are expected to remain relatively constant. Constant heads were also used within the basins that are surrounded slurry walls to simulate the average surface water elevations in the basins. The modeled CHBs are shown on Attachment C and summarized on Table B-1.

2.3.2 River Boundary Conditions

River boundary conditions are a head-dependent boundary condition, where the model computes the difference in head between the boundary and the model cell where the boundary is defined. River Boundary condition cells were used for the Kankakee River, as shown in Attachment A. River heads were defined by two USGS gauging stations that fell within the model grid, downstream at USGS station 05517530 in Kouts and upstream at USGS 05517500 at Dunns Bridge. The river width was estimated from satellite imagery, the river bottom elevation was assumed to be three feet lower than the stage, and the bed thickness was assumed to be 10 feet. The hydraulic conductivity of the river was set through calibration at 64.5 feet/day which is slightly lower than aquifer hydraulic conductivities discussed in Section 1.1.2.4.1.

2.3.3 Stream Boundary Conditions

Stream boundary conditions are a simplified version of river boundary conditions where surface water flow is monitored by MODFLOW and water is added or removed from the model based on the stream stage. Stream boundary conditions were used in the Model for Davis Ditch and Stalbaum Ditch, as shown in Attachment C. The stream width was estimated from satellite imagery, the stream bottom elevation was assumed to be 0.5 to 2 feet lower than the stage depending on size of the stream, and the bed thickness was assumed to be 5 feet. The hydraulic conductivity of the river was set at 100 feet/day for Davis Ditch where loosing stream conditions were expected, and at 0.5 feet per day in Stalbaum ditch where perched conditions where assumed to exist. Stream stage was set off two gauging stations in Stalbaum, SW-04 and SW-10. Elsewhere stream stage was estimated from surface elevations and then refined through model calibration.

2.3.4 Drain Boundary Conditions

Drain boundary conditions are a version of river/stream boundary conditions that can only remove water from the model. Drain boundary conditions were used in the Model for intermittent streams and drainage ditches, as shown in Attachment C. The drain width was estimated from satellite imagery, the drain bottom elevation was assumed to be 1 to 2 feet lower than the stage depending on size of the drain, and the bed thickness was assumed to be 1 foot. The hydraulic conductivity of the drains was set at 100 feet/day. Drain stage was estimated from surface elevations and then refined through model calibration.

2.3.5 No Flow Boundaries

No flow boundaries were assigned to the northeast side of the Kankakee River, as shown in Attachment C.

2.3.6 Horizontal Flow Barriers

A hydraulic flow barrier (HFB) or wall is a condition that limits flow between adjacent cells based on an assigned thickness and hydrologic conductivity. To model the slurry walls that are present around ponds, Golder used the HFB boundary condition with an assigned thickness of 1 foot and a horizontal hydraulic conductivity (K) value of 0.0000001 to model slurry walls that surround the basins. The location of HFB boundaries are presented in Attachment C

2.4 Model Input Parameters

The following paragraphs describe the input parameter data used for the model. Golder simulated steady state conditions in the model. Transient dependent parameters such as porosity and storage/storativity were not included in the model calibration process.

2.4.1 Hydraulic Conductivity

Golder based hydraulic conductivity values for the Site model on pumping test analysis results as discussed in Section 6.0 of the AT-01 Aquifer Test Report (Golder, 2020) and summarized in Table B-2. Golder used these results to assign initial hydraulic conductivity values to the groundwater flow model, and to check that the hydraulic conductivity values resulting from model calibration were within the range of values observed. Golder assigned a uniform Kx/Ky hydraulic conductivity value of 215 feet/day and a Kz of 21.5 feet/day across the entire model area for Layers 1 and 2. Layer 3 had a slightly lower hydraulic conductivity of 200 feet/day and a Kz of 20.0 feet/day across the entire model area. These hydraulic conductivities are based on a best fit from model calibration, and are within range of measured conductivities.

2.4.2 Precipitation Recharge

Precipitation recharge is the amount of precipitation that recharges the aquifer, which is generally the precipitation rate minus losses due to runoff and evapotranspiration. Recharge rates calculated for the area were presented in Letsinger (2015) and used in the model. After model calibration a best fit recharge value of 7.1 inches per year (0.00162 feet/day) was established, which was similar to the published rates. A recharge rate of 0.04 inches/year (0.00001 ft/day) was used for the capped landfill areas. Precipitation recharge rates are shown in Attachment D.

2.4.3 Groundwater Extraction and Recharge Wells

Groundwater extraction or recharge wells are present on and adjacent to the Site and were modeled in all versions of the model, as shown in Attachment D. The well field located on the northeast corner of the model contains eight wells that remove a total of 55,343 cubic feet/day. In the central portion of the Site the 5 cooling tower wells and two Miox wells remove a total of 7,701 cubic feet/day, and just west of the Site on well on the adjacent property removes 9,625 cubic feet/day.

3.0 MODEL CALIBRATION AND VERIFICATION

Model calibration consists of successive refinement of the model property assignments and input data from initial assumptions/estimates to improve the fit between observed and model-predicted results. A solution of a groundwater flow model problem requires information including aquifer parameters such as hydraulic conductivity, spatial boundary conditions, and the location and magnitude of applied stresses, such as recharge and drainage.

A solution is attained only when the proper combination of the above parameters and inputs are selected such that the physical problem is accurately represented by the model. The calibrated model described below should be considered a limited hydrologic effort founded on the available information within the context of necessary simplifying assumptions.

The purpose of the calibration effort was to simulate "steady-state" groundwater flow conditions that approximate the general flow patterns inferred from September 2019 groundwater level measurements. The model was calibrated through trial-and-error adjustment of model parameter values and through use of Model-Independent PEST, developed by Watermark Computing, to refine aquifer parameters. PEST allows model input parameters to be adjusted automatically over a given range until the model predicted head matches the observed head with the lowest possible numerical difference, referred to as the calibration residual (Doherty, 2016). Golder set the allowable range of parameter adjustment in PEST to represent realistic values as determined by previously published literature for the region and aquifer tests at the Site.

At each well location, the head residuals were calculated in Groundwater Vistas as the difference between the measured and simulated head values. Positive residual values indicate simulated head values were lower than measured elevations, while negative residual values indicate simulated head values were higher than measured elevations.

As a measure of the accuracy of the model, Groundwater Vistas calculates summary statistics using calculated residuals, which are used as measures of error in the calibrated model. The residual mean (RM) is the arithmetic mean of all calculated residual values. The absolute residual mean (ARM) is the arithmetic mean of the absolute value of the residuals (i.e., all negative residuals are considered positive). The root mean square error (RMSE) is the square root of the mean of the squared value of target residuals. Other statistics such as the residual standard deviation (RSD) (i.e., the square root of the variance [the average of the squared deviations from the mean]), and the sum of squared residuals (SSR) (computed by squaring each residual and adding them together) can also be useful in evaluation of the calibration process. While calibrating the model, Golder selected parameters estimated by PEST that were within a valid range from published literature or Site-specific data that resulted in improved calibration summary statistics.

3.1 Simulated Heads Calibrated to September 2019 Conditions

Measured groundwater elevations for 112 monitoring points from September 2019 were used for calibration, as presented in Table B-3. The model files for September 2019 calibration simulation use the root file name *V12_2019.* The simulated heads and residuals for targets screened in Layer 1 are presented in Attachment F. Based on the simulated contours of groundwater elevation, groundwater flows from the south/southwest toward the Site before it travels to the Kankakee River in the north/northeast.

A comparison of model-predicted versus observed September 2019 potentiometric heads for the 112 selected calibration points resulted in a RM of -0.36 feet and a RMSE of 0.72 feet. The calibration statistics for the model are presented in Table B-4. The RM of -0.36 feet, represents 4.9 percent of the total measured head difference for the model area (approximately 7.41 feet). The absolute residual mean for the model run is 0.57 feet, which is 7.7 percent of the total hydraulic head difference for the entire modeling area. The residual mean and the absolute residual mean are within the generally accepted standard of 10 percent of the total hydraulic head difference for the modeling area.

3.1.1 Water Balance

An effective measure of model calibration is the analysis of the water budget calculated by MODFLOW. The model provides flows across boundaries, flows to and from all sources and sinks, and flows generated by storage. Inflows into the model include:

- Constant head boundaries: 16,716 ft^3/d,
- Rivers: 165,339 ft^3/d,
- Streams: 182,984 ft^3/d and
- Recharge: 545,949 ft^3/d.

Outflows in the model include

- Constant head boundaries: 5,640 ft^3/d,
- Wells: 70,469 ft^3/d,
- Rivers: 474,633 ft^3/d,
- Streams: 400,512 ft^3/d, and
- Drains: 45,574 ft^3/d.

The outflow deficit is 85,842 cubic feet per day (ft^3/d), which is equivalent to error between outflow and inflow estimates of approximately 8.9 percent.

3.1.2 Numerical Model Verification

Model verification was performed using a second water level calibration data set from October 2018. The model input parameter values defined in the September 2019 simulation were maintained. The verification data is presented in Table B-5. The model files for the October 2018 conditions use the root file name *V12.1_2019*. The verification results indicate a RM of 0.33 feet, which represents 4.1 percent of the total hydraulic head difference for the model area. The absolute residual mean for this simulation was 0.52 feet, which is 6.5 percent of the total hydraulic head difference for the entire model area. The verification statistics suggests that the model is calibrated and verified.

4.0 DESIGN SIMULATIONS

Using the calibrated model, Golder used MODPATH (Pollack, 1989) to simulate travel times for particles released from the metals cleaning basin. Particles were started in Layer 3 of the model to simulate the release of contaminants in the deeper part of the aquifer where Boron concentrations exceeded 10 micrograms/liter. Effective porosity of the aquifer was varied between 0.16, 0.3, and 0.46 to represent values within the expected range for medium to fine sand. The length of the particle traces produced by MODPATH along with travel time estimates were used to calculate average groundwater velocities. These travel time calculations are presented in Table B-6.

5.0 GROUNDWATER MODELING SUMMARY

Through standard numerical groundwater modeling procedures, Golder developed a steady state groundwater flow model for the Site that is considered calibrated and verified. This model was utilized to inform the groundwater monitored natural attenuation study by simulating travel times for particles released from the metals cleaning basin.

6.0 REFERENCES

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Harbaugh, Arlen W, 2005. MODFLOW-2005, The U.S. Geological Survey Modular Ground-Water Model—the Ground-Water Flow Process. U.S. Geological Survey Techniques and Methods 6-A16

Letsinger, S. L., 2015, Map of Indiana showing near-surface aquifer recharge: Indiana Geological Survey Miscellaneous Map 92, scale 1:500,000.

Pollock, D.W., 1989 Documentation of computer programs to compute and display pathlines using results from the U.S. Geological Survey modular three-dimensional finite-difference groundwater flow model. U.S. Geological Survey, Open File Report 89-381.

List of Attachments:

Attachment A Model Grid

Attachment B Cross Section of Model Grid

Attachment C Boundary Conditions

Attachment D Precipitation Recharge Zones

Attachment E Active Pumping Wells

Attachment F Model Calibration – September 2019

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Table B-1 Boundary Conditions

Table B-2 Site Pumping Test Results

Table B-3 Measured Groundwater Elevations - September 2019

Table B-4 Calibration Residuals and Summary Statistics - September 2019

Table B-5 Verification Residuals and Summary Statistics – October 2018

Table B-6 Travel Time Simulations

Table B-1 Boundary Conditions
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Constant Head Boundaries

Name	Layer	Reach	Starting Head (ft)	Ending Head (ft)
Intake Settling Basin	1	104	675 0	675.0
Final Settling Basin	1	101	675 0	675.0
Drying Area	1	100	672 0	672.0
Unnamed SW. Stream	1	1	663.17	661.20

Rivers

Name	Layer	Starting Stage (ft)	Starting Bed Elevation (ft)	Ending Stage (ft)	Ending Bed Elevation (ft)	Starting Width (ft)	Ending Width (ft)	Length (ft)	Thickness of Bed (ft)	Hydraulic Conductivity (ft/d)
Kakakanee River	1	651.82	649.10	646.72	644.01	135 28	159.88	24.0	10.0	64.41

Streams

Name	Layer	Starting Stage (ft)	Starting Bed Elevation (ft)	Ending Stage (ft)	Ending Bed Elevation (ft)	Starting Width (ft)	Ending Width (ft)	Length (ft)	Thickness of Bed (ft)	Hydraulic Conductivity (ft/d)	Slope of Channel (ft/ft)
Davis Ditch	1	661.99	659.99	650.29	646.31	20.05	74.80	50	10.0	63.41	0.001
Stalbaum Ditch	1	660.74	659.74	654.5	652.0	10.07	50	28	1.0	50	0.001
Fisher Ditch	1	661.49	659.49	660.88	658.88	30.04	32.08	51	5.0	100	0.001
Stalbaum South Ancillary Ditch	1	661.50	660 0	659.21	657.76	2.06	29.93	31	1.0	10	0.001
Stalbaum East Ancillary Ditch	1	661 0	655.36	657.17	655.21	18.80	30.36	13	5.0	0.1	0.001
Coal Yard Ditch	1	660.7	659.00	660.7	659	5.0	5.0	50	1.0	50	0.001

Drains

Name	Layer	Starting Stage (ft)	Ending Stage (ft)	Starting Width (ft)	Ending Width (ft)	Length (ft)	Thickness of Bed (ft)	Hydraulic Conductivity (ft/d)
Sands Ditch	1	662 0	654.1	1 0	5	38	1	50
W. Sands Drain	1	660 0	655 6	2	2	27	1	50
Hilliard St Ditch	1	659	659	2	2	24	1	10
N. LF Drain	1	661	661	8 8	8 8	50 0	1.0	62.0
S. LF Drain	1	661	661	8 8	8 8	50 0	1.0	62.0
W. LF Drain	1	661	661	5	5	50	2	100

Hydraulic Flow Barriers (Slurry Walls)

Name	First Layer	Last Layer	Thickness (ft)	Hydraulic Conductivity (ft/d)
Intake Settling Basin Slurry Wall	1	3	1	1.00E-07
Final Settling Basin Slurry Wall	1	3	1	1.00E-07
Drying Area Slurry Wall	1	3	1	1.00E-06

Table B-2: Site Pumping Test Results
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Pumping Test Results		Estimated Hydraulic Conductivity (ft/d)
SHALLOW WELLS	*Minimum:*	192
	Maximum:	363
	Arithmetic Mean:	266
DEEP WELLS	*Minimum:*	234
	Maximum:	320
	Arithmetic Mean:	268

Table B-3: Measured Groundwater Elevations - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Well ID	Layer	Groundwater Elevation (ft msl)
GAMW01	1	658.89
GAMW01B	3	658.72
GAMW03	1	659.84
GAMW03B	3	659.26
GAMW07	1	660.74
GAMW07B	3	660.79
GAMW08	1	658.87
GAMW08B	3	658.98
GAMW09	1	659.27
GAMW09B	3	658.87
GAMW12	1	658.64
GAMW12B	3	658.66
GAMW13	1	658.35
GAMW13B	3	658.37
GAMW14	1	658.14
GAMW14B	3	658.12
GAMW15	1	660.35
GAMW15B	3	660.33
GAMW16	1	659.31
GAMW16B	3	659.46
GAMW17B	3	658.92
GAMW18	1	658.92
GAMW18B	3	659.17
GAMW20	1	658.21
GAMW24	1	658.66
GAMW24B	2	658.73
GAMW25	1	658.41
GAMW25B	2	658.41
GAMW26	1	658.33
GAMW26B	3	658.26
GAMW27	1	658.29
GAMW27B	3	658.32
GAMW29	1	657.48
GAMW29B	3	657.48
GAMW30	1	657.42
GAMW30B	3	657.51
GAMW31	1	657.24
GAMW31B	2	657.25
GAMW32	1	657.19
GAMW32B	3	657.15
GAMW33	1	657.04
GAMW33B	3	657.13
GAMW34	1	657.58

Table B-3: Measured Groundwater Elevations - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Well ID	Layer	Groundwater Elevation (ft msl)
GAMW34B	3	657.59
GAMW35B	2	658.16
GAMW36	1	656.67
GAMW36B	3	656.69
GAMW37B	2	657.26
GAMW38	1	657.91
GAMW38B	3	657.91
GAMW39	2	657.88
GAMW39B	3	657.84
GAMW40	1	657.66
GAMW40B	3	657.65
GAMW42	1	658.12
GAMW42B	3	658.13
GAMW43	1	657.83
GAMW43B	3	657.83
GAMW44	1	657.71
GAMW44B	3	657.69
GAMW45B	3	654.52
GAMW46	1	655.22
GAMW46B	3	655.21
GAMW48	1	654.5
GAMW48B	3	654.51
GAMW49	1	656.26
GAMW49B	3	656.34
GAMW50	1	656.37
GAMW50B	3	656.35
GAMW51	1	658.07
GAMW51B	3	658.19
GAMW52	1	657.81
GAMW52B	3	657.82
GAMW53	1	658.04
GAMW53B	3	658.21
GAMW54	1	657.87
GAMW54B	3	657.82
GAMW55B	3	657.78
GAMW56	1	657.81
GAMW56B	3	657.77
GAMW02	1	660.14
GAMW05	1	658.17
GAMW06	1	659.65
GAMW10	1	657.63
GAMW11	1	657.37
GAMW20B	3	658.25

Table B-3: Measured Groundwater Elevations - September 2019
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NIPSCO LLC R. M. Schahfer Generating Station

Well ID	Layer	Groundwater Elevation (ft msl)
MW-1D	3	659.11
MW-1S	2	659.09
MW-2S	2	657.7
MW-3D	3	656.68
MW-4S	2	657.08
MW-5D	3	658.17
MW-5S	2	658.14
MW-6D	3	654.1
MW-6S	2	654.07
MW-7D	3	656.12
MW-7S	2	656.1
MW-8S	3	654.65
MW-9D	3	655.18
MW-9S	3	655.14
MW-10D	3	658.66
MW-10S	1	658.61
MW-11D	3	656.75
MW-11S	2	656.73
MW-12D	3	656.97
MW-12S	2	656.95
MW-13D	3	657.2
MW-13S	2	657.17
MW-14D	2	656.51
MW-14S	2	656.54
SW-4	1	661.48
SW-10	1	660

Table B-4: Calibration Residuals and Summary Statistics - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
Layer 1			
GAMW01	658.89	658.87	0.02
GAMW03	659.84	660.22	-0.38
GAMW07	660.74	662.14	-1.40
GAMW08	658.87	658.87	0.00
GAMW09	659.27	659.05	0.22
GAMW12	658.64	658.58	0.06
GAMW13	658.35	658.50	-0.15
GAMW14	658.14	658.57	-0.43
GAMW15	660.35	662.08	-1.73
GAMW16	659.31	659.11	0.20
GAMW18	658.92	659.30	-0.38
GAMW20	658.21	658.72	-0.51
GAMW24	658.66	659.16	-0.50
GAMW25	658.41	658.67	-0.26
GAMW26	658.33	658.34	-0.01
GAMW27	658.29	658.09	0.20
GAMW29	657.48	658.19	-0.71
GAMW30	657.42	658.20	-0.78
GAMW31	657.24	658.12	-0.88
GAMW32	657.19	657.99	-0.80
GAMW33	657.04	657.92	-0.88
GAMW34	657.58	658.44	-0.86
GAMW36	656.67	657.59	-0.92
GAMW38	657.91	658.24	-0.33
GAMW40	657.66	658.27	-0.61
GAMW42	658.12	658.62	-0.50
GAMW43	657.83	658.54	-0.71
GAMW44	657.71	658.56	-0.85
GAMW46	655.22	654.39	0.83
GAMW48	654.5	654.25	0.25
GAMW49	656.26	656.37	-0.11
GAMW50	656.37	656.86	-0.49
GAMW51	658.07	658.84	-0.77
GAMW52	657.81	657.89	-0.08
GAMW53	658.04	658.21	-0.17
GAMW54	657.87	658.36	-0.49
GAMW56	657.81	658.51	-0.70
GAMW02	660.14	659.81	0.33
GAMW05	658.17	658.77	-0.60
GAMW06	659.65	660.42	-0.77

Table B-4: Calibration Residuals and Summary Statistics - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
GAMW10	657.63	658.34	-0.71
GAMW11	657.37	658.19	-0.82
MW-10S	658.61	659.16	-0.55
SW-4	661.48	657.77	3.71
SW-10	660	659.21	0.79
Layer 2			
GAMW24B	658.73	659.16	-0.43
GAMW25B	658.41	658.67	-0.26
GAMW31B	657.25	658.12	-0.87
GAMW35B	658.16	659.00	-0.84
GAMW37B	657.26	658.24	-0.98
GAMW39	657.88	658.29	-0.41
MW-1S	659.09	659.72	-0.63
MW-2S	657.7	658.54	-0.84
MW-4S	657.08	657.79	-0.71
MW-5S	658.14	658.13	0.01
MW-6S	654.07	654.60	-0.53
MW-7S	656.1	656.26	-0.16
MW-11S	656.73	657.28	-0.55
MW-12S	656.95	657.48	-0.53
MW-13S	657.17	657.95	-0.78
MW-14S	656.54	657.27	-0.73
Layer 3			
GAMW01B	658.72	658.87	-0.15
GAMW03B	659.26	660.22	-0.96
GAMW07B	660.79	660.99	-0.20
GAMW08B	658.98	658.87	0.11
GAMW09B	658.87	659.05	-0.18
GAMW12B	658.66	658.58	0.08
GAMW13B	658.37	658.50	-0.13
GAMW14B	658.12	658.57	-0.45
GAMW15B	660.33	662.22	-1.89
GAMW16B	659.46	659.11	0.35
GAMW17B	658.92	659.55	-0.63
GAMW18B	659.17	659.30	-0.13
GAMW26B	658.26	658.34	-0.08
GAMW27B	658.32	658.13	0.19
GAMW29B	657.48	658.19	-0.71
GAMW30B	657.51	658.20	-0.69
GAMW32B	657.15	657.98	-0.83
GAMW33B	657.13	657.92	-0.79

Table B-4: Calibration Residuals and Summary Statistics - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
GAMW34B	657.59	658.44	-0.85
GAMW36B	656.69	657.59	-0.90
GAMW38B	657.91	658.24	-0.33
GAMW39B	657.84	658.29	-0.45
GAMW40B	657.65	658.27	-0.62
GAMW42B	658.13	658.62	-0.49
GAMW43B	657.83	658.54	-0.71
GAMW44B	657.69	658.56	-0.87
GAMW45B	654.52	653.66	0.86
GAMW46B	655.21	654.39	0.82
GAMW48B	654.51	654.24	0.27
GAMW49B	656.34	656.36	-0.02
GAMW50B	656.35	656.86	-0.51
GAMW51B	658.19	658.84	-0.65
GAMW52B	657.82	657.88	-0.06
GAMW53B	658.21	658.21	0.00
GAMW54B	657.82	658.36	-0.54
GAMW55B	657.78	658.47	-0.69
GAMW56B	657.77	658.51	-0.74
GAMW20B	658.25	658.72	-0.47
MW-1D	659.11	659.72	-0.61
MW-3D	656.68	657.50	-0.82
MW-5D	658.17	658.13	0.04
MW-6D	654.1	654.61	-0.51
MW-7D	656.12	656.26	-0.14
MW-8S	654.65	654.32	0.33
MW-9D	655.18	654.27	0.91
MW-9S	655.14	654.28	0.86
MW-10D	658.66	659.16	-0.50
MW-11D	656.75	657.27	-0.52
MW-12D	656.97	657.48	-0.51
MW-13D	657.2	657.95	-0.75
MW-14D	656.51	657.27	-0.76

Calibration Parameter	Value
Residual Mean (ft)	-0.36
Redsidual Standard Deviation (ft)	0.63
Absolute Residual Mean (ft)	0.57
Residual Sum of Squares	59
RMS Error	0.72
Minimum Residual (ft)	-1.89
Maximum Residual (ft)	3.71

Table B-4: Calibration Residuals and Summary Statistics - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
Range of Observations (ft)			7.41
Scaled Residual Standard Deviation			0.085
Scaled Absolute Mean			0.076
Scaled RMS (%)			9.8
Number of Observations			112

Table B-5: Verification Residuals and Summary Statistics – October 2018
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
Layer 1			
GAMW01	659.19	658.87	0.32
GAMW03	660.82	660.22	0.60
GAMW07	659.27	660.62	-1.35
GAMW08	659.06	658.87	0.19
GAMW09	660.34	659.05	1.29
GAMW12	658.84	658.58	0.26
GAMW13	658.72	658.50	0.22
GAMW14	659.55	658.57	0.98
GAMW15	659.10	660.00	-0.90
GAMW16	659.07	659.11	-0.04
GAMW18	659.57	659.30	0.27
GAMW20	659.81	658.72	1.09
GAMW24	659.90	659.16	0.74
GAMW25	659.67	658.67	1.00
GAMW26	659.73	658.34	1.39
GAMW27	659.67	658.09	1.58
GAMW29	658.28	658.19	0.09
GAMW30	658.62	658.20	0.42
GAMW31	658.13	658.12	0.01
GAMW32	657.99	657.99	0.00
GAMW33	657.84	657.92	-0.08
GAMW34	658.47	658.44	0.03
GAMW36	657.71	657.59	0.12
GAMW38	659.19	658.24	0.95
GAMW40	658.76	658.27	0.49
GAMW42	658.40	658.62	-0.22
GAMW43	658.16	658.54	-0.38
GAMW44	657.95	658.56	-0.61
GAMW46	655.25	654.39	0.86
GAMW48	654.68	654.25	0.43
GAMW49	656.86	656.37	0.49
GAMW50	657.22	656.86	0.36
GAMW51	658.42	658.84	-0.42
GAMW52	657.99	657.89	0.10
GAMW53	658.14	658.21	-0.07
GAMW54	658.47	658.36	0.11
GAMW56	658.86	658.51	0.35
GAMW02	660.52	659.81	0.71
GAMW05	658.53	658.77	-0.24
GAMW06	658.63	660.42	-1.79

Table B-5: Verification Residuals and Summary Statistics – October 2018
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
GAMW10	658.61	658.34	0.27
GAMW11	657.97	658.19	-0.22
MW-10S	659.83	659.16	0.67
SW-4	662.48	657.77	4.71
SW-10	660.45	659.21	1.24
Layer 2			
GAMW24B	659.95	659.16	0.79
GAMW25B	659.69	658.67	1.02
GAMW31B	658.14	658.12	0.02
GAMW35B	659.16	659.00	0.16
GAMW37B	658.42	658.24	0.18
GAMW39	659.08	658.29	0.79
MW-1S	659.76	659.72	0.04
MW-2S	658.58	658.54	0.04
MW-4S	657.62	657.79	-0.17
MW-5S	659.47	658.13	1.34
MW-6S	654.83	654.60	0.23
MW-7S	656.72	656.26	0.46
MW-11S	657.55	657.28	0.27
MW-12S	657.68	657.48	0.20
MW-13S	657.97	657.95	0.02
MW-14S	657.49	657.27	0.22
Layer 3			
GAMW01B	659.23	658.87	0.36
GAMW03B	660.31	660.22	0.09
GAMW07B	659.29	660.56	-1.27
GAMW08B	659.12	658.87	0.25
GAMW09B	659.94	659.05	0.89
GAMW12B	657.90	658.58	-0.68
GAMW13B	658.70	658.50	0.20
GAMW14B	658.50	658.57	-0.07
GAMW15B	659.13	660.03	-0.90
GAMW16B	659.14	659.11	0.03
GAMW17B	659.18	658.84	0.34
GAMW18B	660.15	659.30	0.85
GAMW26B	659.66	658.34	1.32
GAMW27B	659.70	658.13	1.57
GAMW29B	658.43	658.19	0.24
GAMW30B	658.71	658.20	0.51
GAMW32B	657.95	657.98	-0.03
GAMW33B	657.89	657.92	-0.03

Table B-5: Verification Residuals and Summary Statistics – October 2018
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
GAMW34B	658.46	658.44	0.02
GAMW36B	657.72	657.59	0.13
GAMW38B	659.21	658.24	0.97
GAMW39B	659.04	658.29	0.75
GAMW40B	658.68	658.27	0.41
GAMW42B	658.41	658.62	-0.21
GAMW43B	658.10	658.54	-0.44
GAMW44B	657.91	658.56	-0.65
GAMW45B	654.52	653.66	0.86
GAMW46B	655.24	654.39	0.85
GAMW48B	654.67	654.24	0.43
GAMW49B	656.94	656.36	0.58
GAMW50B	657.25	656.86	0.39
GAMW51B	658.58	658.84	-0.26
GAMW52B	658.00	657.88	0.12
GAMW53B	658.24	658.21	0.03
GAMW54B	658.42	658.36	0.06
GAMW55B	658.68	658.47	0.21
GAMW56B	658.87	658.51	0.36
GAMW20B	659.85	658.72	1.13
MW-1D	659.76	659.72	0.04
MW-3D	657.50	657.50	0.00
MW-5D	659.47	658.13	1.34
MW-6D	654.86	654.61	0.25
MW-7D	656.70	656.26	0.44
MW-8S	654.80	654.32	0.48
MW-9D	655.15	654.27	0.88
MW-9S	655.14	654.28	0.86
MW-10D	659.83	659.16	0.67
MW-11D	657.52	657.27	0.25
MW-12D	657.64	657.48	0.16
MW-13D	657.96	657.95	0.01
MW-14D	657.46	657.27	0.19

Calibration Parameter	Value
Residual Mean (ft)	0.33
Redsidual Standard Deviation (ft)	0.71
Absolute Residual Mean (ft)	0.52
Residual Sum of Squares	69
RMS Error	0.78
Minimum Residual (ft)	-1.79
Maximum Residual (ft)	4.71

Table B-5: Verification Residuals and Summary Statistics – October 2018
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
Range of Observations (ft)			7.96
Scaled Residual Standard Deviation			0.09
Scaled Absolute Mean			0.066
Scaled RMS (%)			9.9
Number of Observations			112

Table B-6: Travel Time Simulations
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

	Shallow Flow Paths				Deep Flow Paths			
Starting Well	**GAMW-16**	**GAMW-18**	**GAMW-17B**	**GAMW-09B**	**GAMW-16B**	**GAMW-18B**	**GAMW-17B**	**GAMW-09B**
Ending Well	**GAMW-53**	**GAMW-55**	**GAMW-54B**	**GAMW-54B**	**GAMW-53B**	**GAMW-55B**	**GAMW-54B**	**GAMW-54B**
Distance (ft)	**1521**	**1964**	**1200**	**1714**	**1521**	**1964**	**1200**	**1714**
Effective Porosity = 16%								
Travel Time (years)	4.8	11.0	4.5	8.9	5.0	11.0	5.5	9.0
Velocity (ft/year)	317	179	267	193	304	179	218	190
Time to Davis Ditch (years)	5.5	-	-	-	6	-	-	-
Time to property boundry near GAMW46B (years)	-	27	49	41	-	28.5	45	41
Effective Porosity = 30%								
Travel Time (years)	8.5	19.8	8.0	16.0	8.9	20.0	10.0	16.5
Velocity (ft/year)	179	99	150	107	171	98	120	104
Time to Davis Ditch (years)	10	-	-	-	9.9	-	-	-
Time to property boundry near GAMW46B (years)	-	49.8	79	75	-	51.5	80	76
Effective Porosity = 46%								
Travel Time (years)	13.0	31.0	12.0	25.0	13.5	29.0	15.0	25.0
Velocity (ft/year)	117	63	100	69	113	68	80	69
Time to Davis Ditch (years)	15	-	-	-	15	-	-	-
Time to property boundry near GAMW46B (years)	-	76.8	122	117	-	77	130	120

Notes:
ft = feet



NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRD, MCWD, AND DRYING AREA
MICHIGAN CITY GENERATING STATION

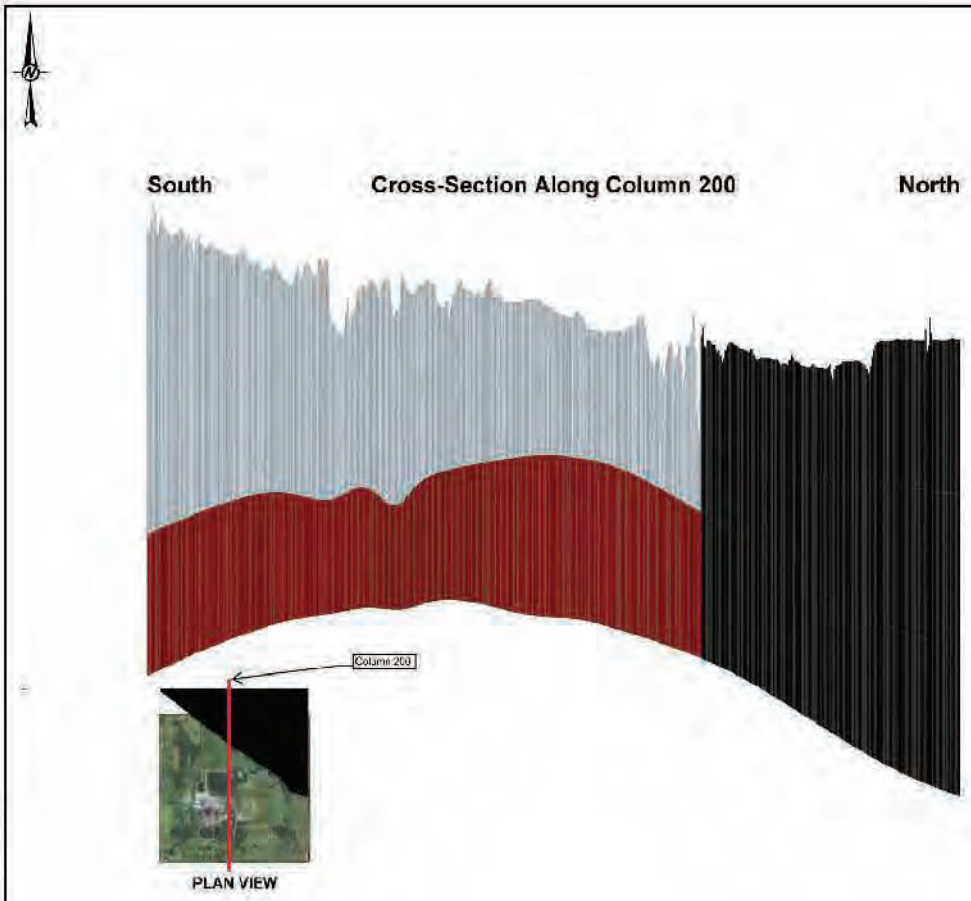
MODEL GRID

GOLDER

DESIGNED RWB

APPROVED RWB

19121587 A



CLIENT
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

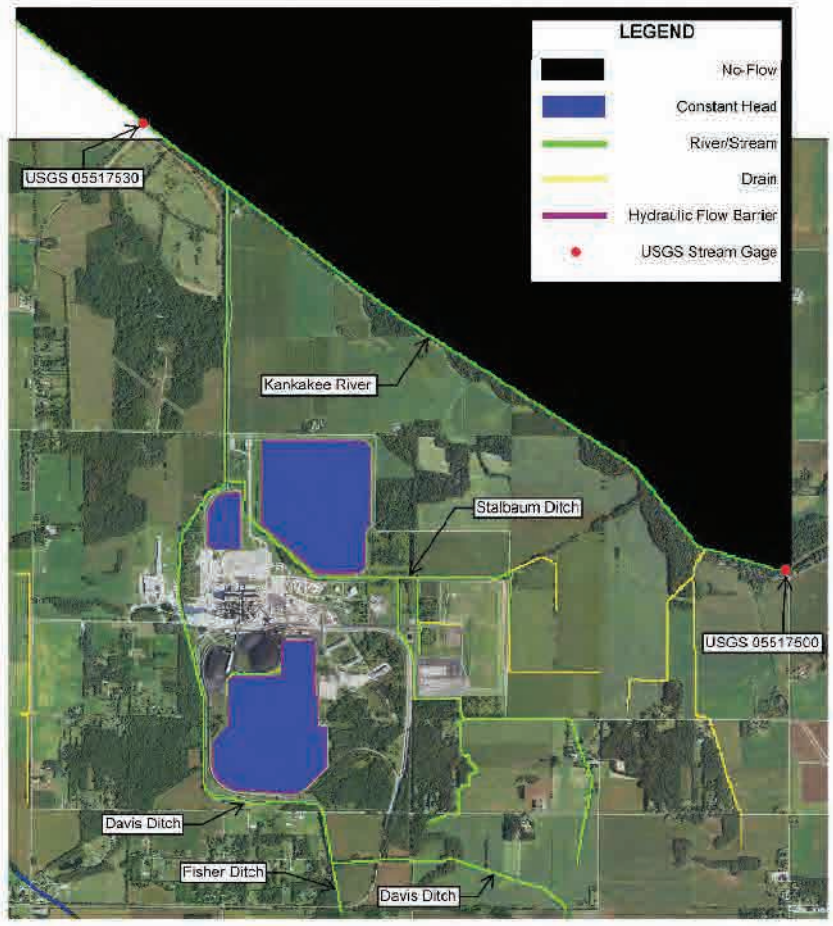
PROJECT
GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRD, MCWD, AND DRYING AREA
NIPSCO R.M. SCHAHFER GENERATING STATION

TITLE
CROSS SECTION OF MODEL GRID

CONSULTANT
GOLDER

DESIGNED	RWB
PREPARED	SR
REVIEWED	BP
APPROVED	RWB

PROJECT NO. 19121587 | B



NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

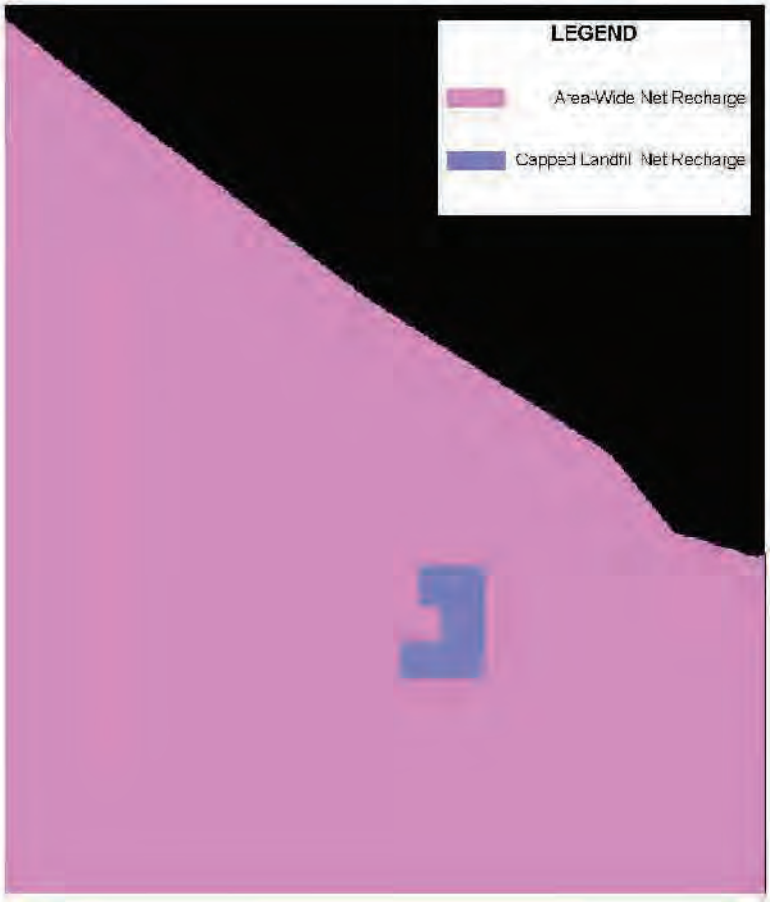
GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRB, MCWD, AND DRYING AREA
MICHIGAN CITY GENERATING STATION

BOUNDARY CONDITIONS

GOLDER

DESIGNED: RWB

PROJECT NO.: 19431587 | CONTROL: - | REV: - | C



NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRD, MCWD, AND DRYING AREA
MICHIGAN CITY GENERATING STATION

PRECIPITATION RECHARGE ZONES

GOLDER

DESIGNED RWS

APPROVED MKG

19121587 D



LEGEND

Well Location

0 700 1,400

Feet

1:1 - 1,667 (at)

NOTE(S)

1. DASTON MODEL VER. 2018.

REFERENCE(S)

1. COORDINATE SYSTEM: NAD 1983 STATE PLANE INDIANA WEST FIPS 1302 FEET
2. 2019 NAIP IMAGERY RETRIEVED FROM ESRI ARCGIS ONLINE IMAGERY SERVICE LAYER

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRD, MCWD, AND DRYING AREA
NIPSCO R.M. SCHAHFER GENERATING STATION

TITLE

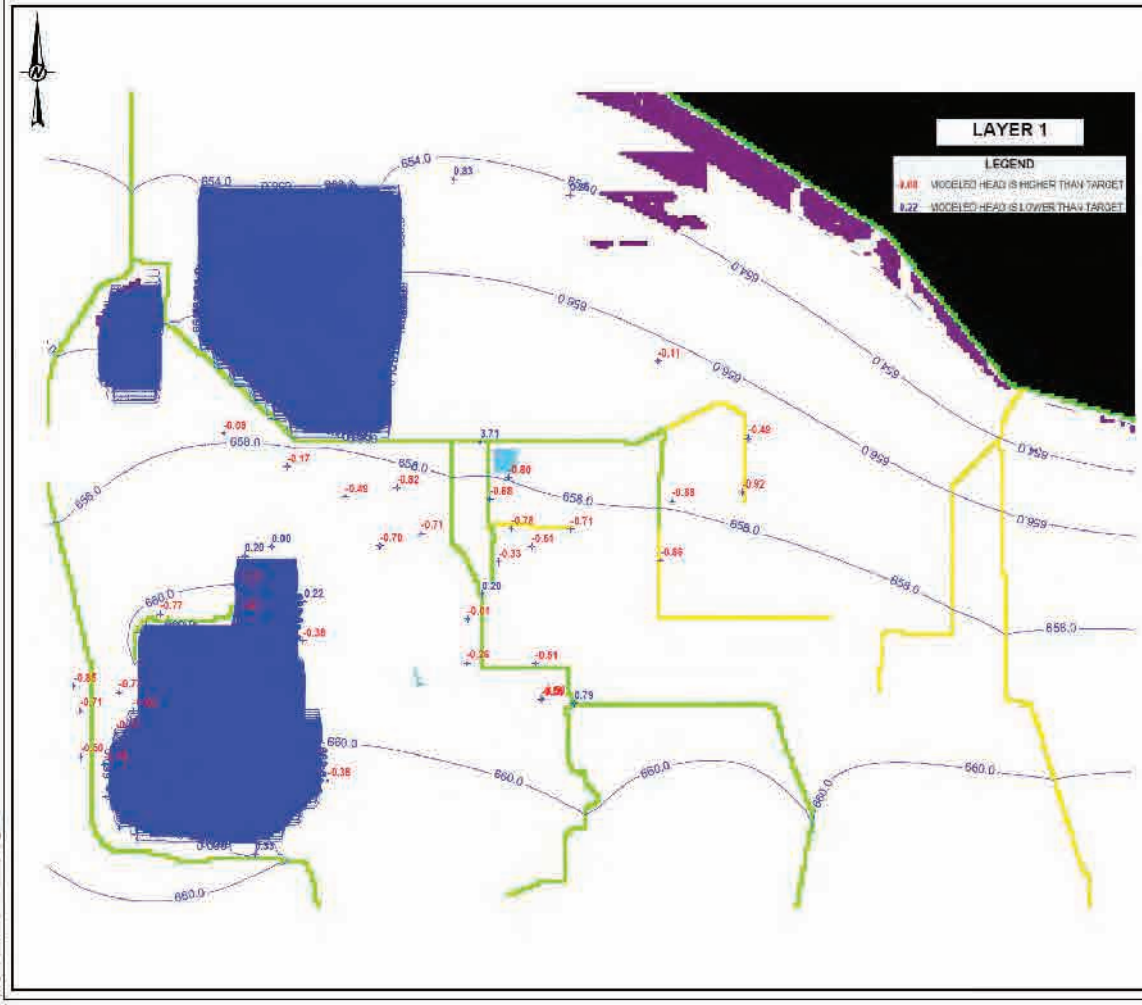
ACTIVE PUMPING WELLS

CONSULTANT

GOLDER

YYYY-MM-DD	2020-12-09
DESIGNED	RWS
PREPARED	SR
REVIEWED	RP
APPROVED	DAH

PROJECT NO. 19121567 | CONTROL - | REV. - | FIGURE NO. E



NOTE(S):
1. BASED ON MODEL V12_2019

REFERENCE(S):
1. COORDINATE SYSTEM: WGS 1984 WEB MERCATOR AUXILIARY SPHERE

CLIENT:
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT:
GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRB, MCWD, AND DRYING AREA
NIPSCO R.M. SCHAHFER GENERATING STATION

TITLE:
MODEL CALIBRATION - SEPTEMBER 2019

CONSULTANT:
GOLDER

YYYY-MM-DD	2020-12-22
DESIGNED	RWB
PREPARED	SR
REVIEWED	RP
APPROVED	RWB

PROJECT NO.: 19121567 | CONTROL: - | REV.: - | FIG. NO.: F



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APPENDIX O

CCR Assessment of Corrective Measures Addendum 3 – March 2022

GOLDER
MEMBER OF WSP

REPORT

MCU Assessment of Corrective Measures - Addendum #3

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

Submitted to:

Northern Indiana Public Service Company LLC

801 East 86th Avenue
Merriville, Indiana 46410

Submitted by:

Golder Associates USA Inc.

10 Al Paul Lane, 1st Floor
Merrimack, New Hampshire 03054

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20447130.01

June 2022

Northern Indiana Public Service Company LLC (NIPSCO)
R. M. Schahfer Generating Station – MSRB, MCWB and DA (collectively the Multi-Cell Unit [MCU] or CCR Unit)
Wheatfield, Indiana

Certification of Addendum #3 to the Assessment of Corrective Measures Report 40 CFR §257.96 & Corresponding Regulations under Indiana Administrative Code

I have personally reviewed Addendum #3 to the assessment of corrective measures (ACM) report that was prepared by Golder Associates Inc. (Golder) and dated July 2021. The subject of Addendum #3 to the ACM Report is three impoundments, the Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and Drying Area (DA), which are collectively referred to as the Multi-Cell Unit (MCU) or simply the CCR Unit, at the NIPSCO R. M. Schahfer Generating Station. Based on an inquiry of those individuals immediately responsible and on supporting data that I understand to be true, accurate, and complete, I verify the information in this Addendum #3 to the ACM Report is accurate and meets the applicable requirements of the CCR Rule and Indiana Administrative Code. In consideration of the above, I certify to the best of my knowledge, information, and belief, that Addendum #3 to the ACM Report for the regulated CCR management unit referred to as the MCU has been prepared and meets the applicable requirements of 40 CFR §257.96 and corresponding State of Indiana requirements.



Joseph Bernard Gormley, Jr.
Indiana Professional Engineer
License #: PE11900213

6/17/2022
Date

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APPENDICES

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Acronyms

ACM	Assessment of Corrective Measures
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
COC	Constituents of Concern
DA	Drying Area
GAC	granular activated carbon
GDL	Geocomposite drainage layer
GWPS	Groundwater Protection Standards
Golder	Golder Associated USA Inc.
IDEM	Indiana Department of Environmental Management
ISS	In situ Stabilization/Solidification
LLDPE	linear low-density polyethylene
MCWB	Metal Cleaning Waste Basin
MCU	Multi-Cell Unit
MNA	Monitored Natural Attenuation
MSRB	Material Storage Runoff Basin
NIPSCO	Northern Indiana Public Service Company LLC
NPDES	National Pollutant Discharge Elimination System
O&M	Operations & Maintenance
POC	Point of Compliance
POTW	Publicly Owned Treatment Works
PRB	Permeable Reactive Barrier
SSL	Statistically Significant Level
SOR	Selection of Remedy
ug/L	Microgram per liter
USEPA	United States Environmental Protection Agency
ZVI	zero-valent iron

1.0 INTRODUCTION

On behalf of Northern Indiana Public Service Company LLC (NIPSCO), Golder Associates USA Inc*., a member of WSP* (Golder) has prepared this Addendum #3 to supplement, refine, and update findings of the April 2019 CCR Assessment of Corrective Measures (ACM) Report and the November 2020 and July 2021 ACM Addenda for the Rollin M. Schahfer Generating Station (RMSGS, Site) located at 2723 E 1500 N Road, in Wheatfield, Jasper County, Indiana (see ACM Addendum #3, Figure 1). Specifically, Golder has included updated findings relative to the detection of cobalt, a 40 Code of Federal Regulations (CFR) Coal Combustion Residuals (CCR) Rule as amended Appendix IV constituent, at a statistically significant level (SSL) above the groundwater protection standard (GWPS). Cobalt has been identified as the only CCR Rule Appendix IV SSL above the GWPS, detected at a single shallow groundwater monitoring location immediately downgradient of three collectively monitored impoundments, the Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and Drying Area (DA), together the Multi-Cell Unit (MCU) or simply the CCR Unit (ACM Report, Golder 2019; ACM Addendum #1, Golder 2020; and ACM Addendum #2, Golder 2021). Addendum #3, Figure 2 shows the location of the MCU on RMSGS as well as the names/locations of the individual impoundments.

Previous ACM documents were by design predicated on and tied closely to time frames associated with key regulatory agency approval processes and NIPSCO planned impoundment closure events. These include the MCU Closure Application regulatory review and approval by Indiana Department of Environmental Management (IDEM) and NIPSCO's scheduled 2023 construction implementation. The MCU Closure Application, which addresses critical aspects interrelated with the groundwater remedy, has undergone multiple reviews by IDEM and revisions by NIPSCO. However, additional review comments were recently received, and the Closure Application has not yet been approved by IDEM. Nevertheless, although lacking this approval, NIPSCO/Golder will immediately proceed to the Selection of Remedy (SOR) process following completion of this ACM Addendum #3.

Preparation of an SOR report will be preceded by scheduling/holding a public meeting to present the results of the revised ACM. This meeting will be held at least 30 days prior to the final selection of a groundwater remedy. At present, NIPSCO believes an ACM-based public meeting can be held within the next 60-90 days, subject to personnel availability, logistical details, and input from IDEM.

Following a preliminary review by and based on feedback from conversations with United States Environmental Protection Agency (EPA) Headquarters CCR Rule staff, Golder prepared ACM Addendum #1 to the initial April 2019 ACM to provide further details of its evaluation of the potential corrective measures for the MCU. In accordance with EPA Headquarters staff observations and late 2020 informal discussions with EPA regarding NIPSCO ACM documents prepared at that time, ACM Addendum #1 and succeeding Addenda specifically focus on addressing the following requirements under 40 CFR §257.96(c)

> *"The assessment under paragraph (a) of this section must include an analysis of the effectiveness of potential corrective measures in meeting all of the requirements and objectives of the remedy as described under §257.97 addressing at least the following:*
>
> *1) The performance, reliability, ease of implementation, and potential impacts of appropriate potential remedies including safety impacts, cross-media impacts, and control of exposure to any residual contamination;*
>
> *2) The time required to begin and complete the remedy;*

3) *The institutional requirements, such as state or local permit requirements or other environmental or public health requirements that may substantially affect implementation of the remedy(s).”*

Like the ACM and Addendum #1, ACM Addendum #2 addressed potential groundwater impacts beyond the identified Appendix IV constituent SSL, cobalt. ACM Addendum #2, which superseded and fully replaced ACM Addendum #1, also revised and updated information provided in the predecessor documents, and it incorporated an enhanced final cap design along with post-closure management requirements to supplement MCU source removal (i.e., impoundment closure-by-removal) in all corrective measure alternatives.

Evolution and revision of the enhanced cover system design reflected ongoing requests for additional information by and subsequent discussions with IDEM over the course of more than a year. Although a final closure design in accordance with IDEM requests was prepared and submitted in May 2021, IDEM provided further comments and requested additional information in March 2022. NIPSCO/Golder are currently working to address these requests. Thus, IDEM approval and public notification and request for comment on the draft Closure Application have not yet been issued.

Like the ACM and previous addenda, ACM Addendum #3 addresses groundwater remedial alternatives, consistent with the requirements of the assessment of corrective measures process as outlined in 40 CFR §257.96. Unlike the previous documents, however, ACM Addendum #3 focuses solely on cobalt. This focus is based on an evaluation of groundwater monitoring results from July 2016 to present that showed the following:

- Cobalt is the sole Appendix IV constituent detected in shallow groundwater at a statistically significant level (SSL)
- The Cobalt SSL was detected in a single shallow-screened monitoring well that is located immediately downgradient of the MCU
- Cobalt concentrations have been and are continuing to decline since the initial identification of cobalt at an SSL.

This progression of the ACM process, including revision of the most recent ACM document and preparation of this ACM Addendum #3, reflects the ongoing CCR Unit-specific state regulatory review and closure approval processes. Furthermore, this progression is consistent with EPA Headquarters’ staff observations and their subsequent discussions with NIPSCO regarding previously prepared ACM documents. The specific discussion during October 13 and November 24, 2020, conference calls included comments by several senior EPA representatives[1] that ACMs were “living documents” and thus subject to revisions in accordance with changes in conditions. As part of this progression, NIPSCO has revised the ACM, as appropriate, in response to site conditions, evolving state regulatory agency (i.e., IDEM) requests/requirements, and changing Federal (i.e., EPA) regulation and policy interpretations.

This Addendum #3, in combination with the remaining applicable sections of the ACM Report (Golder 2019) and Addendum #2 (Golder 2021), results in a process for NIPSCO to move forward towards the selection of a corrective measure that addresses cobalt impacts in groundwater. The following text provides an updated

[1] Senior EPA representatives on the October 13, 2020, conference call included Lydia Anderson, Frank Behan, Laurel Celeste, Kirsten Hillyer, Richard Huggins, Susan Mooney, and Jessica Schumacher. Senior EPA representatives on the November 24, 2020, conference call included Richard Huggins and Stacey Yonce.

summary of the Site background and contaminant plume conditions along with modifications to the identification and evaluation sections of the ACM.

2.0 BACKGROUND

NIPSCO owns and operates the RMSGS which, among other activities, manages CCR in surface impoundments subject to applicable requirements of 40 CFR Part 257 as amended (CCR Rule). Pursuant to 40 CFR §257.96(a), the MCU is subject to an ACM, the results of which were presented in the ACM Report and Addenda. ACM Addendum #3, Figures 2 through 6, show the monitoring well network, geologic cross sections, groundwater elevation contours and cobalt isoconcentration contour maps for the Site. Regional and Site Hydrogeology are summarized in the ACM and supported by mass and volume calculations, slug test data and calculations, and vertical gradient calculation included in Appendices A, B, and C, respectively.

NIPSCO plans to close the MCU by removal in accordance with 40 CFR §257.102(c) and an approved IDEM Closure Application. To meet the requirements of 40 CFR §257.97-98, NIPSCO plans to combine the following MCU closure activities in conjunction with additional groundwater corrective measures for cobalt to demonstrate achievement of applicable groundwater protection standards (GWPS):

- Removal of CCR source material from the MCU
- Construction and maintenance of a low permeability cap over residual materials in the MCU
- Long-term monitoring

These corrective measures are further described in ACM Addendum #3, Table 1.

In the 2019 ACM Report, Golder presented the analytical data for the MCU monitoring wells, identified general groundwater response actions (Table 3), presented an initial screening of corrective measure alternatives/process options for groundwater, and identified eight potential groundwater corrective measures and their key components for further consideration following closure of the MCU.

After preparation of the ACM Report and ACM Addendum #1, NIPSCO performed additional work with respect to future performance of the initially proposed closure approach and its possible impact on groundwater conditions. Based upon this assessment, NIPSCO determined that an enhanced combination soil/geomembrane cap along with a minor modification of the remaining in-place slurry wall, designed to alleviate potential groundwater level build up under the cap, would provide better long-term performance post-closure than either no cap or a soil-only cap. Consequently, NIPSCO proposed this alternative design to IDEM and prepared ACM Addendum #2. As referenced above and as of this writing, consideration of the alternative design remains under IDEM review.

Based on further review of groundwater data and recent EPA policy interpretations, Golder prepared Addendum #3, to modify the ACM to include an evaluation of groundwater remediation alternatives to address cobalt in groundwater.

Because of NIPSCO's decision and subsequent proposal to IDEM to construct a low permeability cap in conjunction with source removal during the closure process, ACM Alternative 2 – Capping with MNA was effectively removed from future consideration. Furthermore, other alternatives that did not previously include or consider the implications of constructing a low permeability cap immediately following source removal were likewise removed from future consideration while other alternatives were modified to reflect the inclusion of a low

permeability cap. The alternatives that were previously removed or modified in ACM Addenda #1 and #2 are listed below:

Alternatives Removed

- In situ Stabilization/Solidification (ISS) and MNA
- Capping, Pump-and-Treat and MNA
- ISS, Pump-and-Treat, and MNA

Alternatives Modified

- MNA
- Vertical Barrier/Hydraulic Controls and MNA
- Pump-and-Treat and MNA
- Vertical Barrier/Hydraulic Controls, Pump-and-Treat, and MNA

Based on the revised focus of Addendum #3 on the SSL exceedance of cobalt in a single shallow location, certain previously removed technologies and alternatives may now be feasible and will be revaluated. These alternatives include Vertical Barriers in the form of permeable reactive barriers and ISS with MNA as presented in the table below:

Alternative	Status	Comments
Monitored Natural Attenuation (MNA)	Retained	MNA feasibility and appropriateness is validated by the Tier I-III evaluation and requires no modifications to the current closure strategy.
Capping and MNA	Removed	Capping is already included in the current closure strategy but remains under review by IDEM with no predictable approval status or timeframe.
Vertical Barrier/Hydraulic Controls and MNA	Retained/Modified	Hydraulic controls can be integrated into the current closure strategy with limited modifications to the cap.
In situ Stabilization/Solidification (ISS) and MNA	Reevaluated	ISS cannot be integrated into the current closure strategy without significant modifications and potentially severe damage to the cap. However, ISS may be an appropriate remedial alternative for the cobalt groundwater plume located downgradient of the MCU.
Pump-and-Treat and MNA	Retained/Modified	Pump and treat external to the current MCU footprint can be integrated into the current closure strategy with no impact to the cap.

Alternative	Status	Comments
Capping, Pump-and-Treat, and MNA	Removed	Capping is already included in the current closure strategy.
Vertical Barrier/Hydraulic Control, Pump-and-Treat, and MNA	Retained/Modified	Hydraulic controls and pump-and-treat external to the current MCU footprint can be integrated into the current closure strategy with limited modifications to the cap.
ISS, Pump-and-Treat, and MNA	Removed	ISS cannot be integrated into the current closure strategy without significant modifications and potentially severe damage to the cap. Furthermore, ISS and pump-and-treat would be incompatible technologies for treatment of the downgradient cobalt plume.

3.0 CONTAMINANT PLUME CONDITIONS

Due to the required schedule for closure and EPA's recent interpretations of the timeline to select and implement a corrective remedy, the ACM is being revised to address Appendix IV constituents with SSL exceedances as described in Section 1. The only such constituent is cobalt, which has been found to exceed the SSL level of 6 micrograms per liter (μg/L) and the GWPS of 10 μg/l in one well, GAMW-08 located hydraulically downgradient and immediately to the north of the MCU.

In accordance with the requirement of 40 CFR 257.95(g)(1), the nature, mass, and extent of contamination must be characterized for the ACM. Groundwater samples have been collected at least bi-annually from GAMW-08 since July 2016. The analytical sampling results indicate cobalt concentrations ranging from 7.9 to 59 μg/L, with an average of 29 μg/L. The cobalt concentration detected during the most recent monitoring event in September 2021 was 15 μg/L (see Table 2) which exceeds the GWPS. However, cobalt concentrations in this well have reflected a generally decreasing trend since November 2016.

No other assessment monitoring wells adjacent to the MCU have been found to contain cobalt at an SSL above the GWPS. The maximum cobalt concentration detected in porewater samples collected from the MSRB portion of the MCU is 2.2 μg/L. An alternative source determination has not been made regarding the detections in GAMW-08; therefore, for the purposes of this ACM addendum the source of the contamination is assumed to be due to a release from the MCWB portion of the MCU, the porewater of which has not been sampled. Cobalt has not been detected in monitoring well GAMW-08B, which is co-located with GAMW-08 and screened from 27.5 to 37.5 feet below ground surface (ft bgs), compared to the screened interval of GAMW-08 which extends from 5 to 15 ft bgs.

The assumed extent of the plume potentially requiring treatment (i.e., cobalt concentrations exceeding the GWPS) is shown on Figure 6. The plume dimensions shown were developed by extrapolating cobalt concentrations between an assumed concentration of 20 μg/L at the downgradient end of the slurry wall and known concentrations at GAWM-08, cross-gradient wells GAMW-16R and -17, and downgradient wells GAMW-53, -54, and -55. Based on these extents and concentrations the mass of cobalt within the plume needing to be treated was calculated to be between 0.07 and 0.18 kilograms (see Appendix A for calculation).

4.0 IDENTIFICATION OF POTENTIAL CORRECTIVE MEASURES

4.1 Source Material

As discussed in the ACM Report and Addendum #2, NIPSCO plans to close the MCU in accordance with 40 CFR §257.102(c) and an approved IDEM Closure Application. NIPSCO's approach combines CCR source removal/capping and groundwater remediation, including addressing a single-location cobalt GWPS exceedance in accordance with recommendations of the ACM/SOR processes, and monitoring to demonstrate achievement of the IDEM-approved Closure Application requirements and applicable GWPS. The multi-part corrective action approach will be integrated, but it will also be sequenced to address both the requirements of 40 CFR §257.97-98 for cobalt exceedances of GWPS during the near-term and allow for monitoring of early-stage post-closure results and plume stability. This approach will facilitate optimization of subsequent groundwater monitoring steps following completion of the initial source removal and capping stages.

The first phase of the integrated CCR Unit closure approach is closure by removal/capping of the MCU. Following dewatering activities, the three impoundments will be excavated. In accordance with the Closure Application, excavations are being planned to remove CCR and non-CCR materials to the original design limits (sides and bottom) of the impoundments, leaving the slurry wall in-place. Satisfactory excavation will be confirmed by a visual determination that the CCR materials have been removed (Wood 2021).

Following completion of CCR excavation and visual verification of the source removal activities, a final low permeability cap will be installed. As proposed to IDEM, the final cap will consist of the following components presented in descending order from top to bottom (Wood 2021):

- Topsoil (6-inch)
- Cover soil (18-inch)
- Geocomposite drainage layer (GDL)
- 40-mil linear low-density polyethylene (LLDPE) geomembrane
- Subgrade fill.

During cap construction a hydraulically downgradient section of the slurry wall will be permanently removed down to the average elevation of the groundwater table to address the water buildup/overtopping possibility within the former impoundment. This action should reduce concerns regarding long-term cap performance and maintenance; however, it may result in periodic discharges from within the former impoundment of diluted water that has previously been in contact with CCR. Monitoring within and outside the capped former impoundment will inform NIPSCO with future water quality data, allowing review of closure remedy performance and identifying post-closure groundwater quality trends outside the former CCR Unit.

4.2 Groundwater Impacts

As noted above, ACM Addendum #3 focuses on addressing cobalt-impacted groundwater downgradient of the MCU. As such, those alternatives that are effective at remediating groundwater in the downgradient plumes will be evaluated further. These include alternatives that were previously considered and are still applicable (e.g., ISS), and alternatives that were not previously considered but are now applicable (e.g., passive reactive barriers). For clarification and to differentiate the ACM Addendum #3 alternatives from those presented and discussed in predecessor documents, the remaining alternatives are renumbered as follow:

- Alternative A – MNA
- Alternative B – Vertical Barrier/Hydraulic Controls and MNA
- Alternative C – Pump-and-Treat and MNA
- Alternative D – Vertical Barrier and MNA
- Alternative E – ISS and MNA

Initial corrective action measures screening results are presented in ACM Addendum #3 Table 4 and a summary of the retained groundwater corrective measure alternatives is shown in ACM Addendum #3 Table 5. The remedial components of the groundwater corrective measure alternatives following source removal and capping are described further in Section 5.

5.0 EVALUATION OF POTENTIAL GROUNDWATER CORRECTIVE MEASURES

5.1 Evaluation Criteria

In conformance with the applicable requirements of 40 CFR §257.96 and 40 CFR §257.97, Golder evaluated the effectiveness of each of the five remaining potential groundwater corrective measures originally identified in the ACM Report (Golder 2019) using the following criteria:

- **Performance** - Potential corrective measures were evaluated for their relative performance based on the magnitude of reduction of existing risks, ability to obtain the GWPS at the point of compliance (POC), the magnitude of residual risks in terms of likelihood of future releases due to remaining CCR following implementation of remedy, and the required type and degree of long-term management including monitoring, operation, and maintenance associated with the corrective measure.
- **Reliability** - Potential corrective measures were evaluated for their relative reliability based on the long-term reliability of engineering and institutional controls, potential need for the replacement of the remedy, extent to which containment practices will reduce further releases, and extent to which the treatment technologies may be used.
- **Ease of Implementation** - Potential corrective measures were evaluated based on their relative ease of implementation based on difficulty associated with construction of the technology, operational reliability of the technology(ies), coordination of regulatory approvals and permits from pertinent agencies, availability of necessary equipment and specialists, and availability capacity and location of needed treatment, storage, and disposal services.
- **Potential Impacts** - Potential corrective measures were evaluated based on their relative potential impacts based on safety impacts, cross-media impacts, and control of exposure. Exposure controls include short-term risks during implementation of a remedy and potential exposure to remaining wastes to the community or environment including potential threats associated with excavation, transportation, re-disposal of CCR, or contaminant.
- **Time Requirements** - Potential corrective measures were evaluated based on the time required to initiate, construct, and complete the remedy.

- **Institutional Requirements** - Potential corrective measures were evaluated based on their institutional requirements including local, state, and federal permit needs.

5.2 Evaluation Summaries

Relative to the above evaluation criteria, the following sections present brief summaries of the proposed groundwater corrective measure alternatives considered prior to and following source removal, associated dewatering, and capping. It should be noted that these closure-related actions are considered a part of all the remedial alternatives discussed in this section because source removal and dewatering will address and help control the presumed source of the release and reduce or eliminate further releases of cobalt (and any other CCR-related Appendix IV constituents) as required under 40 CFR 257.97(b)(3). In addition, the summaries highlight areas where a particular remedy may perform well or poorly relative to other alternatives. A summary of Golder's evaluation of the retained groundwater corrective measure alternatives is provided in ACM Addendum #3 Table 6.

5.2.1 Alternative A: Monitored Natural Attenuation

Golder evaluated MNA alone as a potential groundwater corrective measure for a number of CCR-related potential Site constituents of concern (COCs), including the Appendix IV SSL cobalt. The MNA Evaluation (Golder 2020) is presented in Appendix D. The results of the evaluation indicate that MNA is a technically feasible and appropriate corrective measure for groundwater at the Site based on the following factors:

- Attenuation is already occurring at the Site at a reasonable rate
- The dissolved plume is stable
- The aquifer has the long-term capacity to attenuate COCs
- Cobalt has been detected at only a single location immediately downgradient of the MCU and concentrations appear to be decreasing with time

Based on the results of the Tier I, II, and III MNA evaluations for the Site, Golder concluded that MNA is expected to provide good long-term performance at reducing cobalt concentrations through chemical (i.e., adsorption and co-precipitation) and physical processes (e.g., diffusion, dispersion). While MNA alone typically will not substantially affect groundwater concentrations in the short-term, Golder's review of cobalt concentrations since monitoring began in 2016 indicates the concentrations are currently decreasing.

Linear Regression Analysis

A linear regression analysis of the cobalt concentrations at GAMW-08 indicates that groundwater would attain the GWPS for cobalt (0.010 mg/l) by January 2022 without implementation of any active remedial technologies. Furthermore, if similar attenuation rates are assumed at the MCU boundary along with a starting cobalt concentration of 0.020 mg/l, groundwater will meet the GWPS at the downgradient side of the MCU in approximately 2 years.

The above cobalt concentration estimates are based on current conditions and do not take source removal and dewatering into account, which would likely further shorten these timeframes. While these timeframes are based on incomplete data and linear interpolation of existing data with a degree of variation, they do provide an order-of-magnitude estimate of the remediation timeline indicating a relatively short timeframe for MNA alone to remediate groundwater at the Site.

MNA Evaluation

For the MNA evaluation, Golder conducted a point decay evaluation at monitoring wells downgradient of the MCU. Based on the results of the evaluation, the maximum concentration of cobalt observed in downgradient wells over the period of monitoring would take approximately 39 years to attenuate to concentrations below the GWPS (Golder 2020). However, this estimate is based on a point decay constant calculated using the decrease in concentration between GAWM-08 and the next nearest downgradient well GAMW-52, which is located approximately 1,200 feet downgradient. Cobalt has not been detected in GAMW-52 so the point decay constant and subsequently the estimated time for the cobalt concentration to reach the GWPS was a conservative estimate. As discussed above, more recent data from GAMW-08 indicates that the rate of attenuation may be significantly higher than estimated.

For the evaluation, Golder also considered the following factors:

- The low groundwater flow velocities observed at the Site
- The distance from the MCU to the property boundary and lack of off-Site migration of groundwater impacts
- The lack of potable water supply wells at the Site in the vicinity of the MCU and the downgradient plume
- Planned institutional controls prohibiting use of groundwater from any impacted area at the Site for drinking water

Based on these other factors, MNA is expected to be protective of human health and reduce environmental degradation of groundwater containing cobalt that is not removed during closure.

Because there is an existing monitoring well network downgradient of the MCU, implementation of a supplemental MNA program is unlikely to require any component construction/installation apart from additional monitoring wells between GAMW-08 and GAMW-53, -54, and -55. Installation of such wells may be complicated by the presence of a complex subsurface utility network and surface infrastructure located hydraulically downgradient of and adjacent to the MCU. Therefore, MNA will be relatively easy to implement following regulatory approval and poses no short-term safety risks, but it may not be feasible to install new MNA performance monitoring wells at optimal locations (i.e., immediately downgradient of GAMW-08). Long-term operation and maintenance (O&M) will include routine semi-annual groundwater sampling and potentially periodic well redevelopment.

5.2.2 Alternative B: Vertical Barrier/Hydraulic Controls and MNA

For the Vertical Barrier/Hydraulic Control and MNA Alternative, hydraulic controls within the existing slurry wall would be added to the MNA alternative. The Vertical Barrier/Hydraulic Control and MNA alternative would be implemented to reduce or eliminate downgradient migration of potentially impacted groundwater by generating a hydraulic gradient inward toward the MCU. This alternative assumes that the existing slurry wall is intact, albeit slightly modified from the original design to address potential water buildup with the former impoundment cell, and that implementation of this alternative consists of installation and operation of a pump-and-treat system within the former impoundment areas as necessary to prevent potential over-topping of the modified slurry wall by water impacted above the GWPS due to groundwater recharge.

The Vertical Barrier/Hydraulic Control and MNA Alternative would have a similar effect as the MNA Alternative on groundwater downgradient of the closed MCU with the added benefit of active contaminant mass removal (to the extent such remains an issue of concern following closure by removal) and reduction of Appendix IV constituent

contaminated groundwater releases from the MCU. It would reduce or eliminate the volume of impacted groundwater potentially overtopping and/or passing through the existing or modified slurry wall(s), thus removing a potential residual source of contamination, and allowing for more efficient natural attenuation. This remedy would also result in removal of contaminant mass through groundwater extraction and treatment with an appropriate media such as cobalt-specific ion exchange resin or granular activated carbon (GAC) depending on the results of pilot treatment studies, which would reduce the potential for future releases of impacted groundwater if the integrity of the slurry wall is shown to be compromised.

Because there is an existing and functional slurry wall around the MCU, corrective measure implementation would include design, well installation, enclosure construction, and treatment system assembly/construction. Some treatment system components may require lead times prior to delivery; however, most components should be readily available. An amendment to the Site's National Pollutant Discharge Elimination System (NPDES) permit would likely be required to discharge treated water to an on-site stormwater pond, which could delay implementation while awaiting regulatory review.

Well installation would be complicated due to the geomembrane cap to be installed as part of the unit closure. Extraction wells would either need to be installed prior to cap placement and incorporated into the cap design, or the cap would need to be penetrated and repaired following well installation.

In the event of unidentified contaminant breakthrough, there is the potential for treated water containing unacceptable contaminant levels to be discharged in the treatment system effluent. However, this is unlikely to occur as the treatment media vessel effluent will be monitored routinely and the system will be designed with a redundant "lag" vessel to treat any breakthrough contaminants in the lead vessel effluent until the lead vessel can be changed out.

The hydraulic control system will require a high level of periodic O&M compared to more passive alternatives (i.e., MNA, vertical barriers, ISS) as influent and effluent samples will likely need to be collected monthly and there is significant potential for shut-downs due to the number of different components (filter vessels, ion-exchange columns, pH adjustment system, etc.) that are needed to keep the system operational. Most or all these components will also need replacement over the 30-year design lifetime of the system.

5.2.3 Alternative C: Pump-and-Treat and MNA

For the Pump-and-Treat and MNA Alternative, a groundwater pump-and-treat system would be designed and installed to capture contaminated groundwater present downgradient of the MCU and GAMW-08, to remove impacts from the environment and prevent downgradient off-Site migration. The captured groundwater would then be treated to reduce concentrations to an acceptable concentration and discharged to surface water. Portions of the plume downgradient of the extraction well capture zone would then be subject to MNA as a polishing step in the remedy process.

The Pump-and-Treat and MNA Alternative offers a higher level of short- term protection than vertical barrier/hydraulic control and vertical reactive barriers as it would be quicker and easier to implement due to the limited subsurface infrastructure required and does not need to be coordinated with the CCR Unit closure, though source removal and dewatering during closure are important measures related to controlling/eliminating the release. Contaminant mass removal through operation of the pump-and-treat system will reduce contaminant concentrations and thereby enhance natural attenuation downgradient of the capture zone.

Some treatment system components may require lead times prior to delivery, but most components should be readily available. An amendment to the Site's NPDES permit would likely be required to discharge treated water to an on-site stormwater pond, which could delay implementation while awaiting regulatory review. In the event of unidentified contaminant breakthrough, there is the potential for treated water containing unacceptable contaminant levels to be discharged in the treatment system effluent. However, this is unlikely to occur as the treatment media vessel effluent will be monitored routinely and the system will be designed with a redundant "lag" vessel to treat any breakthrough contaminants in the lead vessel effluent until the lead vessel can be changed out. The system will require a higher level of periodic O&M compared to vertical barrier and ISS as effluent samples will likely need to be collected monthly and there is significant potential for shut-downs due to the number of different components (filter vessels, ion-exchange columns, pH adjustment system, etc.) that are needed to keep the system operational. The O&M would be similar to the vertical barrier/hydraulic control alternative, though would likely be somewhat less onerous due to the need for fewer wells and a lower pumping rate to achieve capture compared to the pumping rate required to generate an inward gradient inside the closed impoundments. Most or all these components will also need replacement over the 30-year design lifetime of the system.

5.2.4 Alternative D: Vertical Barrier and MNA

The Vertical Barrier and MNA Alternative would include a funnel-and-gate permeable reactive barrier (PRB) using an appropriate treatment media such as mixed zero-valent iron (ZVI) and GAC, which has been shown to remove cobalt (Mueller et al. 2009), with MNA to further reduce concentrations of cobalt in any portion of the plume located downgradient of the PRB, and/or cobalt migrating downgradient of the PRB following breakthrough. This alternative would offer a high level of short-term protection as little to no contaminated media would be transported off-site, and long-term protection through the immobilization and subsequent removal (during media changeout) of cobalt-contaminated groundwater. This alternative would offer a similar level of contaminant mass removal to Alternatives B and C as all three alternatives include intercepting or capturing the plume followed by adsorption to a treatment media that can be removed and disposed of off-site. Implementation/installation of a PRB would be substantially more difficult due to the extent and depth of excavation required coupled with the high density of subsurface infrastructure downgradient of the MCU. Long-term O&M requirements consisting of routine monitoring and media changeouts would be less onerous than for the alternatives incorporating active groundwater extraction systems.

5.2.5 Alternative E: ISS and MNA

ISS could be used within the plume area to bind cobalt in a cementitious matrix and reduce its potential to leach into groundwater. MNA would be implemented to address any remaining contaminant mass that is not bound by the ISS process. ISS does not remove contaminant mass, but it does result in sequestration of contaminants from the environment, eliminating potential exposure pathways for human and ecological receptors.

The ISS program would include stabilizing the soil within the cobalt plume. Based on the lack of detections in GAWM-08B and the nearby deep monitoring wells (GAMW-16B and GAMW-17B), the plume appears to be limited vertically to the top 27.5 feet bgs, at most. ISS would be accomplished using a large-diameter (6- to 10-ft diameter) rotary auger capable of injecting slurry chemicals through the auger flight to mix the residual soil with a stabilizing agent. The stabilizing agent will be determined during a design-phase pilot study and will likely consist of a mixture of Portland cement, pozzolans, and/or bentonite. At each location within the plume, the auger would be advanced through the depth of the plume and rotated to thoroughly mix the soil within the auger diameter with the stabilizing agent, generating one "column" of stabilized soil. The auger will then be advanced to an adjacent

area and advanced such that it overlaps with the last column and there are no gaps between stabilized columns. This will continue until the entire plume area exceeding the GWPS has been mixed.

Short-term protection by ISS is low compared to other alternatives due to the high level of effort and materials required to implement and the associated traffic and construction safety issues associated with this technology. ISS offers good long-term protection through the isolation of contaminants from the environment and the geochemical conditions (pH 6.8 to 7.5) at the Site are favorable for the long-term lifetime of the stabilized material. However, due to the high density of subsurface utilities in the area north of the MCU, the ease of implementation for ISS is ranked lowest of the alternatives evaluated and would likely require substantial rerouting of buried piping currently in-service. ISS would also likely take the longest of the alternatives to implement apart from potentially the PRB portion of Alternative D.

5.2.6 Retained Alternatives

Based on the evaluations presented in the preceding sections, each alternative is considered feasible for the Site and fully consistent with the requirements of 40 CFR 257.98, and therefore, retained for further evaluation in the Selection of Remedy (SOR) process. The retained alternatives for the Selection of Remedy process are presented below:

- Alternative A - Monitored Natural Attenuation (MNA)
- Alternative B - Vertical Barrier/Hydraulic Controls and MNA
- Alternative C - Pump-and-Treat and MNA
- Alternative D - Vertical Barrier and MNA
- Alternative E – ISS and MNA

6.0 SUMMARY AND NEXT STEPS

This Addendum #3 supplements the ACM Report (Golder 2019) and replaces in full ACM Addenda #1 (Golder 2020) and #2 (Golder 2021) by providing additional details regarding the remaining five potential groundwater corrective measures originally identified in those reports and evaluating those corrective measures in accordance with the performance requirements identified in 40 CFR §257.96(c). It reflects NIPSCO's enhanced closure strategy, is consistent with ongoing discussions with IDEM in response to comments on the latest Closure Application, and considers recent EPA interpretations of ACM/SOR timing requirements. Addendum #3 is also consistent with EPA's earlier statements regarding ACMs as being living documents, and therefore subject to revision in accordance with changing conditions. A summary of Golder's evaluation of the five retained groundwater corrective measure alternatives is provided in Table 6.

In addition to updating the ACM to reflect the most recent discussions with IDEM and the revision/submission of the Closure Application for IDEM for review and approval, NIPSCO continues to conduct activities in accordance with the expectations of the ACM and SOR processes, including the following:

- Meeting with IDEM mid-April to discuss status and anticipated timing of the Closure Application approval.
- Preparation of bid documents (specifications and drawings) for closure of the MCU.

- Contractor procurement (including contractor pre-qualification, scheduling of site walks, scope of work question-and-answer, request for alternative approach(es), and establishment of a bid due date) to perform the source removal/capping phase of the corrective measures.
- Communications with vendors regarding water treatment technologies, equipment availability, and media costs/handling. This activity also informs and helps refine cost and schedule aspects of the SOR evaluation.
- Developing logistics and potential meeting dates for a public meeting in accordance with 40 CFR 257.96(e).

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Table 1: Applicable Groundwater Cleanup Standards
CCR Unit Schahfer MSRB, MCWB, and DA
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL (mg/L)	GWPS (mg/L)	IDEM RCG (mg/L)
Appendix III Constituents			
Boron	-	NA	4
Calcium	-	NA	-
Chloride	-	NA	-
Fluoride	4	4	0.8
pH	-	NA	-
Sulfate	-	NA	-
Total Dissolved Solids	-	NA	-
Appendix IV Constituents			
Antimony	0.006	0.006	0.006
Arsenic	0.01	0.078	0.01
Barium	2	2	2
Beryllium	0.004	0.004	0.004
Cadmium	0.005	0.005	0.005
Chromium	0.1	0.1	0.1
Cobalt[1]	**0.006[2]**	**0.01**	**0.006**
Fluoride	4	4	0.8
Lead[1]	0.015[2]	0.0007	0.015
Lithium[1]	0.04[2]	0.0082	0.04
Mercury	0.002	0.002	0.002
Molybdenum[1]	0.1[2]	0.036	0.1
Radium 226+228	5	5	-
Selenium	0.05	0.05	0.05
Thallium	0.002	0.002	0.002

Prepared by: DFS
Checked by: KMC
Reviewed by: MAH

Notes:
MCL= Environmental Protection Agency Maximum Contaminant Level
GWPS= Groundwater Protection Standard calculated August 23 2018 Guidance- Table A-6 2018 Revision
mg/L= milligrams per liter
NA= not applicable; GWPS are calculated for Appendix IV constituents only
1) These four constituents do not have an established MCL. Prior to the Phase 1 Part 1 amendment, effective August 29, 2018, the GWPS was calculated based on background concentrations according to the CCR Final Rule.

2) The Phase 1 Part 1 amended health-based standard, effective August 29, 2018 pursuant to 40 CFR §257.95(h)(2)

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW04																								
				2016-07-12	2016-09-08	2016-11-09	2017-01-10		2017-03-01	2017-04-26	2017-06-28	2017-08-22	2017-10-04	2018-03-13	2018-03-14	2018-04-20		2018-10-25	2019-04-23	2019-11-07	2020-05-13		2020-10-22	2021-0 -15	2021-09-23	2021-09-23	
				N	N	N	FD	N	N	N	N	N	N	FD	N	FD	N	N	N	N	FD	N	N	N	FD	N	
Appendix I II Parameters																												
Boron		4	mg/L	.48	1.4	2.4 O	1.1	1	1.2	0.74	0.92	1.2	0.54			0.74	0.72	0.78	0.74	1.3	0 66	0.64	0.	1.1	0.36	0 35		
Calcium			mg/L	10	230	300 O	270	240	230	220	200	200	140			140	140	210	130	190	115	112	90.3	178	108	107		
Chlor de			mg/L	2.2	27	69 O	13	14	13	.4	12	13	4.5			3.7 J	4.4	10	3.7	9.5	2	2	9	6.2	3.7	3 6		
Fluor de	4	4	mg/L	.92 J	0 2 J	10 UO	0.19 J	0.17 J	5 U	5 U	0 19 J	0.21 J	0.24 J	0.15 J	5 U	5 U	0.17 J-	0.26	0.16 J	0.23	0.15	0.15	0 59	0.2	0.35	0 35		
pH			SU	7.22	6 83	6.75		6.93	7.01	6.76	6 88	7.21	7.28		6.95		7.2	6.39	7	7.14		7.42	7.79	7.26		7		
Sulfate			mg/L	40 J-	460	480 O	460	470	390	70	370	440	250			220	210	530	260	490	136	139	82 1	375	116	121		
Total D ssolved Sol ds			mg/L	20	990	1400 O	1000	1000	890	870	880	920	610			580 J	580	980	600	900	411	419	299	726	381	380		
Appendix IV Parameters																												
Antimony	0 006	0.006	mg/L	.002 U	0 002 U	0 00027 JO	0.002 U	0.00057 J	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U	0 002 U			0.002 U	0.00065 J	0.00092 J	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U		
Arsenic	0 01	0.01	mg/L	.0059	0 013	0 0052 O	0 0058	0.0072	0.005 U	0.0099	0 012	0.012		0.004 J	0 0054			0.014	0.0023 J	0.0018 J	0 002	0.002	0 0055	0.0019	0.00 1	0 0036		
Barium	2	2	mg/L	.041	0 077	0.11 O	0.095	0.079	0.089	0.069	0 084	0.09		0.11	0 077			0.074	0.068	0.066	0 076	0.077	0 05	0.079	0.057	0 056		
Bery lium	0 004	0.004	mg/L	.00027 J	0 001 U	0 001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.00048 J	0.00053 J	0.001 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U		
Cadmium	0 005	0.005	mg/L	.001 U	0 001 U	0 001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U		
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0 00036 JO	0 00036 J	0.0052 JO	0.002 U	.002 U	0 002 U	0.002 U		0.0011 J	0 0012 J			0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U		
Coba t		0.006	mg/L	.001 U	0 00031 J	0 00064 JO	0.0061	0.0058	0.0038	0.0049	0 003	0.0023		0.0028	0 0031			0.0026	0.0011	0.00043 J	0 001 U	0.001 U	0 001 U	0.0016	0.001 U	0 001 U		
Fluor de	4	4	mg/L	.92 J	0 2 J	10 UO	0.19 J	0.17 J	5 U	5 U	0 19 J	0.21 J	0.24 J	0.15 J	5 U	5 U	0.17 J-	0.26	0.16 J	0.23	0.15	0.15	0 59	0.2	0.35	0 35		
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0 001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U		
Lithium		0.04	mg/L	.0018 J	0 008 U	0 008 UO	0.0021 J	0.0023 J	0.0033 J	0.0033 J	0.0062 J	0.0062 J		0.008 U	0 008 U			0.0023 J	0.0045 J	0.0028 J	0 008 U	0.008 U	0 008 U	0.008 U	0.008 U	0 008 U		
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0 0002 UO	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U	0 0002 U			0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U		
Molybdenum		0.1	mg/L	.0075 J	0 023	0 073 O	0.037	0.038	0.034	0.016	0 02	0.034		0.0048 J	0 024			0.039	0.024	0.055	0 022	0.022	0 01	0.066	0.015	0 016		
Radium 226 228	5		pCi/L	U	0 583	0 697 O	0 804	0.515 U	0.362 U	0.379 U	0 364 U	0.352 U		1.35 J	0 778 J			0.473	0.591		1.7 U	1.62 U		0.659 U				
Selenium	0.05	0.05	mg/L	.005 U	0 005 U	0 00064 JO	0 0017 J	0.0021 J	0.005 U	0.005 U	0.005 U	0.005 U		0.001 J	0 001 J			0.005 U	0.0013 J	0.0052	0 001 U	0.001 U	0 001 U	0.0033	0.001 U	0 001 U		
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0 001 UO	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U		
Field Parameters																												
Dissolved Oxygen			mg/L	.09	0 58	0 37		1.82	1.47	0.12	0 3	0.52	0.09		0 66		2.3	0.15	7.08	2.55		1.32	0 37	1.71		0 31		
Ox dation Reduct on Potential			m llivolts	9 6	-24	-6.9		-31.7	14	-57 8	-45	-27	-105 8		-181.8		-81.2	-58.1	19	-60.7		-28.6	-7	-29		0.1 9		
pH			SU	7.22	6 83	6.75		6.93	7.01	6.76	6 88	7.21	7.28		6.95		7.2	6.39	7	7.14		7.42	7.79	7.26		7.		
Specif c Conductivity			uS/cm	95	1345	1681		1109	910	137	911	1153	813		562		770	1311	549	866		681	521	950		595		
Temperature			deg C	3	17.3	16.3		10.5	8.05	0.2	13.1	15.9	16.1		7 55		3.5	15 5	4.2	13.2		9.8	16.2	9.2		15 9		
Turbidity			NTU	.04	1.48	2 21		2.28	4.26	4.04	4 88	1.65	0.51		4.92		3.12	1.92	4.48	1.38		3.51	1 9	.67		7 06		

Notes:
DEM RCG= Ind ana Department of Environmental Management
Remed al on Closure Guidance Table A-6 Screening Leve s - 2021 Revision

MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.

J = Indicates the result is estimated.

J- = Indicates the result is estimated and may be biased low.

J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.

O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Table 2: Analytical Results for 2021 Monitoring Wells
NIPSCO Rolls M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GMW07																				GMW07B								
				2013-10-21	2014-04-28	2014-10-21	2015-04-15	2015-10-07	2016-04-13	2016-10-19	2017-04-26	2017-10-18	2018-04-23	2018-10-15	2019-04-22	2019-10-21	2020-04-20	2020-10-26	2021-04-19	2013-10-21	2014-04-28	2014-10-21	2015-04-15	2015-10-07	2016-04-13	2016-10-19	2017-04-26	2017-10-18	2018-04-23	2018-10-15	2019-04-22	2019-10-21	2020-04-20	2020-10-26	2021-04-19
				N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters																																	
Boron		4	mg/L	1.2	1	0.91	0.9 J	1	0.88	0.87	0.88	0.71 J	0.72		1.2	1.2	0.83	0.85	0.87	0.87	1.1	0.81	0.91	0.89	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1
Calcium			mg/L	570	590	580	620	570	590	590	590	590	590		610	590	590	595	610	196	210	196	210	202	206	206	206	206	206	206	206	206	206
Chloride			mg/L	6.8	6.6	5.8	6	7.6	7.8	8.1	8.2 J	8.3	8.4 J		8.7 J	8.5	8.5	7.8	8.3	12.3	11.7	11.9	12	10.6	9.8	17.8	13.6	11.3	21	58	80.3	58	80.3
Fluoride	4	4	mg/L	0.23 J+	0.23 J	0.16 J	0.15 J	0.18 J	0.17 J	0.17 J	0.16 J	0.1 J	0.13 J	0.15 J	0.17 J	0.17 J	0.17	0.17	0.17	0.64	0.68	0.64	0.68	0.66	0.65	0.76	0.75	0.73	0.77	0.73	0.77	0.73	0.77
pH			SU	7.63	7.27	7.91	8.13	7.1	7.12	6.97	7.2		7.2	7.25	7.32	7.31	7.2	7.41	7.2	7.3	6.88	7.14	7.14	7.14	6.98	6.78	7.58	7.15	7.22	7.28	7.44	7.56	7.28
Sulfate			mg/L	1100 J+	1100	1200	1200	1200	1200	1200	1200	990	990	990	1100	1100	1100	1100	1100	396	408	402	399	408	402	402	402	402	402	402	402	402	402
Total Dissolved Solids			mg/L	2700	2800	2800	2700	2700	2800	2800	2800	2800	2800		2900	2800	2800	2800	2800	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100	1100
Appendix IV Parameters																																	
Antimony	0.006	0.006	mg/L	0.00093 J	0.00019 J	0.00093 J	0.00038 J	0.002 U	0.002 U	0.002 U	0.002 U				0.002 U		0.002 U	0.002 U	0.002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0013 J	0.0026 J	0.0019 J	0.0021 J	0.0026 U	0.0026 U	0.0026 U	0.0026 J				0.0026 U		0.0034 J	0.0031 J	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U	0.0031 U
Barium	2	2	mg/L	0.055	0.055	0.056	0.047	0.05	0.05	0.056	0.055				0.056		0.064	0.057	0.045	0.04	0.047	0.046	0.055	0.049	0.072	0.061	0.065	0.045	0.044	0.038	0.041	0.037	
Beryllium	0.004	0.004	mg/L	0.00013 J	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U				0.0001 U		0.0001 U	0.0001 U	0.0001 U	0.00005 U	0.00005 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U				0.001 U		0.0004 J	0.001 U	0.001 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.0005 J	0.0016 J	0.002 U	0.002 U	0.002 U	0.002 U				0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.0009	0.0007	0.0005	0.0008	0.0004	0.0005	0.001	0.0005				0.05		0.0007	0.0006	0.0003	0.0006	0.0008	0.0008	0.0008	0.0006	0.0007 J	0.001 U	0.0003 U	0.0003 U	0.0003 U	0.0003 U	0.0003 U	0.0003 U	0.0003 U
Fluoride	4	4	mg/L	0.73 J+	0.61 J	0.83 J	0.82 J	0.66 J	0.75 J	0.79 J	0.86 J	1.1 J	0.98 J	0.58 J	0.77 J	0.73	0.07 J	0.08	0.69 J	0.64 J	0.68	0.66	0.85	0.85	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.00007 J				0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0043 J	0.008 U	0.008 U	0.0023 J	0.0031 J	0.0041 J	0.0027 J	0.0038 J				0.0021 J		0.0051 J	0.0041 J	0.0023 J	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.0089	0.0019 J	0.0045 J	0.0047 J	0.0023 J	0.008 U	0.008 U	0.008 U	0.013
Mercury	0.002	0.002	mg/L	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U				0.00007 U		0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U
Molybdenum		0.2	mg/L	0.0085 J	0.0088 J	0.0085 J	0.01 U	0.01 U	0.01 U	0.01 U	0.0083 J	0.0062 J			0.01 U		0.0085 J	0.0072 J	0.0085 J	0.0078	0.0078	0.01 U	0.01 U	0.01 U	0.01 U	0.025	0.012	0.025	0.026	0.026	0.038	0.028	0.033
Selenium (2h + 20)	50		mg/L	0.58	0.56	0.545	0.47 J1	0.42 U	0.42 U	0.42 U	0.45	0.39			0.42 U		0.42 U		0.37 U	0.37 U		0.37 U				0.61	0.6 J+	0.7		1.6 U		2.1 U	
Silver	0.05	0.05	mg/L	0.005 U	0.005 U	0.005 J	0.005 J	0.005 U	0.005 U	0.005 U	0.005				0.0058 J		0.0016 J	0.0045 J	0.0015 J	0.0018 J	0.0015 U	0.0068 J	0.0064 J	0.0056 J		0.0012 J	0.0062 U	0.005 U	0.0025 U	0.001 U	0.0011 U	0.0011 U	0.001 U	
Thallium	0.002	0.002	mg/L	0.00013 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.002 U				0.0013 U		0.00024 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																																	
Dissolved Oxygen			mg/L	0.45	1.31	0.58	0.53	0.57	0.58	0.69	0.44		0.48	0.6	0.57	0.56	0.61	0.38		0.34	0.47	0.19		0.25	0.16	0.67	0.19	0.2	0.5	0.19	0.23	0.26
Oxidation Reduction Potential			millivolts	113.2	65.2	6.0	71.3	45.5	25.0	29.1	8.5		93.1	55	98.2	233.8	133	151.8		185.2	209.4	56.6		91	107.6	235.2	51.9	156.2	128.1	73.9	124.1	0.374	
pH			SU	7.63	7.27	7.08	7.35	7.1	6.97	6.97	7.2		7.2	7.25	7.32	7.31	7.2	7.41	7.2	7.3	6.88	7.14	7.14	7.14	6.98	6.78	7.58	7.15	7.22	7.28	7.44	7.56	7.28
Specific Conductivity			uS/cm	3666	3603	3698	3681	3620	3737	3737	3743		3775	3768	3861	3948	3781	3981		1555	1565	1564		1571	1578	1737	1737	1686	2777	2665	1878	2777	
Temperature			deg C	15.4	13.42	19.7	12.9	19.83	12.4	19.8	15.2		11	19	19	19.05	19.4	20.2		20.3	12.2	21.05		17	13.69	12.4	12.4	13.8	12.7	19.2	12.2	11.7	
Turbidity			NTU	3.8	4.51	1.36	8.2	1.76	2.2	2.87	2.9		0.49	1.5	1.72	0.28	0.72	1.58		5.3	1.34	1.14		2.49	0.28	8.04	5.89	3.41	3.48	1.02	2.81	1.01	

Notes:
IDEM RCG – Indiana Department of Environmental Management Remediation Closure Guidance Table A-6 Screening Levels - 2021 Revision
MCL – Maximum Contaminant Level
mg/L – milligrams per liter
SU – standard units
pCi/L – picocuries per liter
uS/cm – microSiemens per centimeter
deg C – degrees Celsius
NTU – Nephelometric Turbidity Units
"U" – Indicates the result was not detected above the method detection limit (MDL) for the sample, the quantitation limit (QL) is provided
"J" – Indicates the result is estimated.
"J1" – Indicates the result is estimated and may be biased.
"J+" – Indicates the result is estimated and may be biased high.
"J-" – Indicates the result is estimated and may be biased low.
"QL" – Indicates the result was not detected above the MDL, the estimated QL is provided
"C1" – Indicates the result was identified as an outlier and removed from the statistical

Tab e 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW08																		GAMW-08B							
				2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-04	2018-03-14	2018-04-23	2018-10-26	2019-05-08	2019-11-07	2020-04-24	2020-10-28	2021-0 -22	2021-09-2	2018-09-0	2018-10-24	2019-05-03	2019-11-07	020-04-2	2020-10-23	2021-0 -22	2021-09-2
				N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix I II Parameters																													
Boron		4	mg/L	.5	3.9	3 2	3.4	3.3	3.2	2.9	2.2	3.7		2.4	1.8	1.4	2.5	3	0 52	0.89	1.1	18	15	14	13	20.4	7	7	8.
Calcium			mg/L	10	310	300	260	270	310	340	270	290		360	230	250	280	309	168	266	260	380	370	350	340	355	203	98	235
Chlor de			mg/L	88	71	89	99	110	86	83	39	87		64	56	49	66	67	26.	50	1 9	240	180	160	180	220	13	78	179
Fluor de	4	4	mg/L	J	1 2 J	0.73 J	0.87 J	0.94 J	0.92 J	1 3 J	2 J	0.68 J	1.2 J	1 3 J-	1.6	2.2	1.9	1.1 J-	0 71	0.97	0.	1 6 J	1 5	1.9	1.7	1.5 J-	0.93	.9	0 73
pH			SU	6.92	7 03	6 85	7.02	7.09	6.93	7	7.27	6.89	7.41	7.41	6.99	7.37	7.5	7.35	6 87	7.0	7.0	7 7	7.45	7 57	7.85	7.89	7.95	9	7.
Sulfate			mg/L	770 J-	690	680	610	630	770	800	640	670		800	460	540	670	719	229	77	8 1	1500	1500	1400	1300	1280	769	51	1060
Total Dissolved Sol ds			mg/L	600	1500	1600	1300	1400	1700	2000	1400	1500		1700	1100	1300	1300	1550	636	1120	2380	1900 J	2300	2300	2200	2560	1250	620	20 0
Appendix IV Parameters																													
Antimony	0 006	0.006	mg/L	.00073 J	0 00069 J	0 0014 J	0.00041 J	0.00043 J	0.002 U	0 00059 J	0.00075 J		0.002 U		0.00082 J	0.00076 J	0.00077 J	0.001 U	0 001 U	0.001 U	0.001 U	0 002 U	0 002 U	0 002 U	0.002 U	0.001 U	0.001 U	.001 U	0 001 U
Arsenic	0 01	0.01	mg/L	.0018 J	0 0019 J	0 0018 J	0.0027 J	0.0016 J	0.0031 J	0 0027 J	0.0023 J		0.005 U		0.0011 J	0.0015 J	0.0016 J	0.0012	0 001 U	0.001 U	0.0013	0 005 U	0 005 U	0 005 U	0.005 U	0.001 U	0.001 U	.001 U	0 001 U
Barium	2	2	mg/L	.068	0 065	0 065	0.05	0.055	0.064	0 074	0.077		0.066	0 069	0.053	0.058	0.066	0.061	0 056	0.07	0.076	0 042	0 03	0 025	0.023	0.028	0.031	.039	0 0 6
Bery lium	0 004	0.004	mg/L	.00017 J	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.0004 J	0.001 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 001 U	0 001 U	0 001 U	0.001 U	0.0002 U	0.0002 U	.0002 U	0 0002 U
Cadmium	0 005	0.005	mg/L	7.4E-05 J	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.00037 J	0.001 U	0.001 U	0.0002 U	0 0002 U	0.0002 U	0.00022	0 001 U	0 001 U	0 001 U	0.001 U	0.0002 U	0.0002 U	.0002 U	0 0002 U
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0 002 U	0.00029 J	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	.002 U	0 002 U
Coba t		0.006	mg/L	.036	0 034	0 059	0.047	0.05	0.037	0 047	0.02		0.022	0 027	0.011	0.0079	0.011	0.022	0 037	0.017	0.015	0 00066 J	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	.001 U	0 001 U
Fluor de	4	4	mg/L	J	1 2 J	0.73 J	0.87 J	0.94 J	0.92 J	1 3 J	2 J	0.68 J	1.2 J	1 3 J-	1.6	2.2	1.9	1.1 J-	0 71	0.97	0.	1 6 J	1 5	1.9	1.7	1.5 J-	0.93	.9	0 73
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	.001 U	0 001 U
Lithium		0.04	mg/L	.0098	0 012	0 009	0.0098	0.0093	0.012	0 011	0.012		0.0089	0 009	0.011	0.015	0.0091	0.0087	0 008 U	0.012	0.015	0 0098	0 0073 J	0 0063 J	0.0058 J	0.008 U	0.008 U	.012	0 01
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	.0002 U	0 0002 U
Molybdenum		0.1	mg/L	.034	0 036	0 024	0.02	0.019	0.038	0 049	0.083		0.058	0 058	0.059	0.08	0.068	0.048	0 013	0.03	0.0 3	0 037	0 039	0 057	0.044	0.05	0.0096	.011	0 011
Radium 226 228	5		pCi/L	.07	1 08	1 09	0.581	0.777	0.632	1 11	0.762		1.13 J	0 99	1 J	0.473		1.25 U		1.57		1.67 J	1 02 J	0 704		1.67 U		.53	
Selenium	0 05	0.05	mg/L	.005 U	0 0065	0 0033 J	0.0014 J	0.0032 J	0.011	0 0088	0.0081		0.024	0 022	0.0021 J	0.016	0.0036 J	0.0062	0 0011	0.01	0.005	0 0014 J	0 005 U	0 005 U	0.005 U	0.001 U	0.001 U	.001 U	0 001 U
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.00045 J	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	.001 U	0 001 U
Field Parameters																													
Dissolved Oxygen			mg/L	.9	0 38	1 62	1.27	0.96	0.63	1.96	0.93	0.21	0.97	5 09	0.21	0.44	4.2	0.34	0.	1	0.35	0.42	0.12	0 13	2.61	0.12	0.33	.29	0 27
Ox dation Reduct on Potential			millivolts	59.7	64.6	-8	58.4	49.9	60.4	242 5	61.9	-15.9	110.1	-106.4	27.7	62 2	44.1	52.5	300	22	19.3	-185.5	-67	7.9	-67	-142 2	-51 2	120.1	0 218
pH			SU	6.92	7 03	6 85	7.02	7.09	6.93	7	7.27	6.89	7.41	7.41	6.99	7.37	7.5	7.35	6 87	7.0	7.0	7.7	7.45	7 57	7.85	7.89	7.95	9	7.
Specif c Conductivity			uS/cm	925	1807	1664	1517	1494	2098	1834	1713	1840	1121	1732	1440	1102	1322	2009	10 0	1 32	167 2	2538	2375	2190	1896	3391	1917	151	286.3
Temperature			deg C	5.5	18.78	17.75	12 2	10 06	11.1	15.8	18.5	18.3	9.6	10.2	17.2	11	10.84	10.5	16.3	11.2	18.8	14.6	14.5	12.8	8.05	13	1	3	15 2
Turbidity			NTU	2.3	3 22	0 58	1.26	1.56	1.1	2.41	0.68	4.38	1.11	1.54	1.4	1.81	0.31	2.5	2.39	1.99	1. 8	3.4	1.63	1 72	2.89	2.91	3.85	.78	3 9

Notes:
DEM RCG= Ind ana Department of Environmental Management
Remed al on Closure Guidance Table A-6 Screening Leve s - 2021 Revision

MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the result is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW09																					
				2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-01		2017-04-26		2017-06-28	2017-08-23	2017-10-03	2018-03-14	2018-04-23	2018-10-25	2019-05-02		2019-11-07	2020-04-24	2020-10-23	2021-0 -28	2021-09-23
				N	N	N	N	FD	N	FD	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	N
Appendix I II Parameters																									
Boron		4	mg/L	_7	4.7	7 3	5.3	7.7	7.6	5.9	6.1	4.9	7.9	7 3		4.9	6.3	3	3	2.7	3 3	3.7	3 5	3.8	
Calcium			mg/L	20	240	210	210	200	200	220	240	270	280	220		220	220	200	200	150	178	192	168	227	
Chlor de			mg/L	63	55	58	58	75	73	71	67	53	39	64		58	82	46	46	39	54.4	59.8	1.6	5 .7	
Fluor de	4	4	mg/L	_15 J	10 U	10 U	0.22 J	0.13 J	0.14 J	0.16 J	0.13 J	0.18 J	2 JO	0 21 J	5 U	0.26 J-	0.28	0 27	0 27	0.33	0 3 J-	0 31	0 26	0.3	
pH			SU	7.27	7 25	7.12	6.68		7.44		7.15	7.25	7 31	7 3	7.28	6.87	6.88		7 1	7.06	7.15	7 92	8. 8 O	7.51	
Sulfate			mg/L	910 J-	570	360	500	440	420	460	460	600	740	540		510	510 J-	530	530	380	390	397	18	509	
Total Dissolved Sol ds			mg/L	500	1100	880	980	1000	990	1000	960	1300	1400	1100		930	1100	970	980	770	772	796	659	10 0	
Appendix IV Parameters																									
Antimony	0 006	0.006	mg/L	_002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0 002 U	0.002 U	0 001 U	0 001 U	0 001 U	0 001 U	0.001 U	
Arsenic	0 01	0.01	mg/L	_0015 J	0 0013 J	0 00076 J	0.0031 J	0.005 U	0.005 U	0.0028 J	0.0029 J	0.002 J	0 0027 J		0.005 U		0.005 U	0.005 U	0 005 U	0.005 U	0 001 U	0 001 U	0 001 U	0 001 U	0.001 U	
Barium	2	2	mg/L	_059	0 043	0 036	0.039	0.035	0.037	0.039	0.042	0.047	0 054		0.041	0.039	0.039	0 041	0.041	0.036	0 032	0 0 6	0 037	0.053	
Bery lium	0 004	0.004	mg/L	_00012 J	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.00036 J	0.001 U	0.001 U	0 001 U		0.001 UO		0.00092 J	0.00058 J	0 00052 J	0.00049 J	0 00039	0 0002 U	0 0002 U	0.0002 U	
Cadmium	0 005	0.005	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U		0.001 U		0.00033 J	0.001 U	0 001 U	0.001 U	0 0002 U	0 0002 U	0 0002 U	0.0002 U	
Chromium	0.1	0.1	mg/L	_0036	0 002 U	0 00062 J	0.0013 J	0.002 U	0.002 U	0.002 U	0.002 U	0.0011 J	0 0015 J		0.0016 J		0.002 U	0.0012 J	0 0012 J	0.002 U	0 002 U	0 002 U	0 002 U	0.002 U	
Coba t		0.006	mg/L	_001 U	0 00018 J	0 0002 J	0.0002 J	0.001 U	0.001 U	0.00029 J	0.00025 J	0.001 U	0 001 U		0.001 U		0.00038 J	0.00049 J	0 00055 J	0.00035 J	0 001 U	0 001 U	0 001 U	0.001 U	
Fluor de	4	4	mg/L	_15 J	10 U	10 U	0.22 J	0.13 J	0.14 J	0.16 J	0.13 J	0.18 J	2 JO	0 21 J	5 U	0.26 J-	0.28	0 27	0 27	0.33	0 3 J-	0 31	0 26	0.3	
Lead	0 015	0.015	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U		0.001 U		0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0 001 U	0 001 U	0.001 U	
Lithium		0.04	mg/L	_0019 J	0 008 U	0 008 U	0.0016 J	0.0011 J	0.0012 J	0.008 U	0.008 U	0.0017 J	0 0018 J		0.008 U		0.008 U	0.008 U	0 008 U	0.008 U	0 008 U	0 008 U	0 008 U	0.008 U	
Mercury	0 002	0.002	mg/L	_0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 UJ		0.0002 U		0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0 0002 U	0 0002 U	0.0002 U	
Molybdenum		0.1	mg/L	_02	0 017	0 029	0.023	0.027	0.027	0.021	0.021	0.028	0 032		0.025	0.035	0.04	0 043	0.043	0.035	0 052	0 051	0 0	0.058	
Radium 226 228	5		pCi/L	_5	0 568	0.477 U	0.467 U	0.55	0.469	0.593	0.414	0.707	0 803		1.45 J	0.096	0.679	0 505	0.427 U		1.47 U		0 6 9 U		
Selenium	0 05	0.05	mg/L	_014	0 0091	0 0049 J	0.011	0.014	0.014	0.019	0.02	0.013	0 027		0.0082	0.011	0.0098	0 012	0.012	0.0077	0 0096	0 0082	0 0053	0.0079	
Thallium	0 002	0.002	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U		0.001 U		0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0 001 U	0 001 U	0.001 U	
Field Parameters																									
Dissolved Oxygen			mg/L	_59	6 69	1.98	6.1		3.41		3.92	5.27	3 24	5.98	6.71	5.43	0.22		6.82	5.54	3 14	3. 3	3. 2	6.2	
Ox dation Reduct on Potential			millivolts	1.4	75.7	27.6	236		90.5		152.6	280.8	58.9	139.5	-116 3	-90.8	-48 8		53.6	-25.7	44	337.2	-20.6	0.2	
pH			SU	7.27	7 25	7.12	6.68		7.44		7.15	7.25	7 31	7 3	7.28	6.87	6.88		7.1	7.06	7.15	7 92	8. 8	7.51	
Specif c Conductivity			uS/cm	671	736	1110	822		1041		1209	702	1542	1331	600	1156	1274		888	685	774	1218	970	138.	
Temperature			deg C	4.4	18.4	16.9	11.9		10.75		11.9	14 7	17.2	18.2	10 2	10 6	17.9		11.4	15.9	10.3	17.8	10.6	18.7	
Turbidity			NTU	_59	3.92	1.15	1.34		3.12		1.88	1.91	0.91	0 39	0.82	2.44	2.41		3.41	1.55	2 37		1 02	2 95	

Notes:
DEM RCG= Ind ana Department of Environmental Management
Remed al on Closure Guidance Table A-6 Screening Leve s - 2021 Revision

MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the result is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

BEFORE THE UNITED STATES DEPARTMENT OF ENERGY

Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and Northern Indiana Public Service Company LLC	)))))	Order No. 202-26-19
Federal Power Act Section 202(c) Emergency Order: Midcontinent Independent System Operator and CenterPoint Energy Indiana South	))))	Order No. 202-26-20

Exhibit to
Motion to Intervene and Request for Rehearing and Stay of
Public Interest Organizations

Exhibit 25C
Schahfer CCR Part A Demonstration
Addendum
Part 3

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW09B																									
				2016-07-13		2016-09-08	2016-11-09	2017-01-10	2017-03-01	2017-04-26	2017-06-28	2017-08-23		2017-10-03	2018-03-14	2018-04-23	2018-09-06	2018-10-26	2019-05-08		2019-11-07	2020-04-27	2020-10-23	2021-0 -20		2021-09-23
				FD	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	FD	N	N	N	N	FD	N	N
Appendix I II Parameters																													
Boron		4	mg/L	24	25	25	16	11	11	11	12	16	16	16		14	12	12	14	14	8	6 1	6.3	8.1	6.2	6.7			
Calcium			mg/L	260	280	270	190	200	170	170	180	180	180	160		160	150	180	150	150	150	148	162	169	171	163			
Chlor de			mg/L	210	180	190	130	110	120	130	150	170	160	140		150	180	150	140	140	110	117	107	102	9	113			
Fluor de	4	4	mg/L	.54 J	0.55 J	0 67 J	0.68 J	0.1 J	1.3 J	1 2 J	1.4 J	1.2 J	0.37 J	1.5 J	1.4 J	1 6 J	1 8 J	1 6	1 6	1.6	1.5	1.3	1.	1.	1.	1 3			
pH			SU		7.08	7.15	6.96	7.36	7.44	7 29	7.36		7.46	7.36	7 56	7.43	7.32	7.46		7.49	7.56	7 65	8		10 9 O	7 56			
Sulfate			mg/L	970 J-	1000 J-	960	740	670 J	550	570	640	630	650	550		430	570	580	510	520	440	387	5 0	582 J	10 0 J	773			
Total Dissolved Sol ds			mg/L	2100	2000	2100	1700	1300	1200	1200	1500	1500	1500	1300		990	1300	1200	1200	1200	990	906	1010	1030	982	1 30			
Appendix IV Parameters																													
Antimony	0 006	0.006	mg/L	.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U		0 002 U		0.002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			
Arsenic	0 01	0.01	mg/L	.0024 J	0.0026 J	0 002 J	0.0014 J	0.0027 J	0.005 U	0 004 J	0.004 J	0.0031 J	0.0031 J		0.0054	0.0064	0.0044 J	0 004 J	0 0052	0.0057	0.0042 J	0.0049	0 003	0.0033	0.003	0 0031			
Barium	2	2	mg/L	.069	0.071	0 076	0.062	0.048	0.04	0 046	0.055	0.062	0.058		0 045	0.04	0.049	0 047	0 042	0.041	0.029	0 034	0.039	0.036	0.035	0 059			
Bery lium	0 004	0.004	mg/L	.00012 J	9.1E-05 J	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0 001 U		0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U			
Cadmium	0 005	0.005	mg/L	.00027 J	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0 001 U		0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U			
Chromium	0.1	0.1	mg/L	.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U		0 002 U		0.002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U			
Coba t		0.006	mg/L	.001 U	0.001 U	0 00069 J	0.00028 J	0.00045 J	0.001 U	0 00028 J	0.00045 J	0.00041 J	0.00041 J		0 001 U		0.00058 J	0 00028 J	0 00022 J	0.00025 J	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0 001 U			
Fluor de	4	4	mg/L	.54 J	0.55 J	0 67 J	0.68 J	0.1 J	1.3 J	1 2 J	1.4 J	1.2 J	0.37 J	1.5 J	1.4 J	1 6 J	1 8 J	1 6	1 6	1.6	1.5	1.3	1.	1.	1.	1 3			
Lead	0 015	0.015	mg/L	.001 U	0.001 U	0 001 U	0.00017 J	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0 001 U		0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			
Lithium		0.04	mg/L	.0055 J	0.0065 J	0 008 U	0.008 U	0.0049 J	0.0045 J	0 0056 J	0.0054 J	0.0047 J	0.0042 J		0 0031 J		0.0037 J	0 0052 J	0 0053 J	0.0055 J	0.0033 J	0.008 U	0 008 U	0.008 U	0.008 U	0 0095			
Mercury	0 002	0.002	mg/L	.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U		0.0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U			
Molybdenum		0.1	mg/L	.01 U	0.0079 J	0 0075 J	0.0097 J	0.013	0.015	0 015	0.013	0.0094 J	0.01		0 014	0.012	0.01	0 011	0 012	0.012	0.0096 J	0.013	0 011	0.012	0.012	0 015			
Radium 226 228	5		pCi/L	.12	1.86	1 65	1.14	0.453	1.09	0.774	1.85	1.01	1.27		1 18 J	0.868	1.04	1 24 J	1 03	1.01		1 28 U		0.92 U	1.67 U				
Selenium	0 05	0.05	mg/L	.005 U	0.005 U	0 005 U	0.005 U	0.002 J	0.005 U	0 0014 J	0.001 J	0.0015 J	0.0016 J		0 005 U		0.002 J	0 0019 J	0 005 U	0.005 U	0.0011 J	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			
Thallium	0 002	0.002	mg/L	.0003 J	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0 001 U		0.001 U	0 001 U	0 001 U	0.0002 J	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			
Field Parameters																													
Dissolved Oxygen			mg/L		0.44	1 06	0.43	0.38	0.44	0 61	0.71		0.57	0.45	0 1	0.04	0.61	0 28		0.04	0.35	0 17	0.3		0.2	0 31			
Ox dation Reduct on Potential			millivolts		-57.7	67.3	-76.4	-100.1	-80 6	-102.6	68.2		19.7	-46 8	-121 6	-130 5	-100.5	-101.1		-16.8	131.8	-106	-29.9		-113.1	0 20			
pH			SU		7.08	7 15	6.96	7.36	7.44	7 29	7.36		7.46	7.36	7 56	7.43	7.32	7.46		7.49	7.56	7 65	8		10. 9	7 56			
Specif c Conductivity			uS/cm		2356	2435	2088	1559	1352	1592	1561		1922	1722	1053	1301	1556	1693		1165	9 24	1419	1513		1 59	201.2			
Temperature			deg C		14.1	14.7	15 1	13.6	13.45	14.5	14.8		15.5	16	14	14.4	16.1	16		14 2	14.4	13.3	15.		13.	16.			
Turbidity			NTU		3.48	4 29	2.17	0.99	2.58	1 88	1.69		2.54	1.96	4 18	4.11	2.96	1 39		4.7	3.36	4 8	2.76		26	3 02			

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mg/L = mil igrams per iter
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pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the result is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.

O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW15																			
				2016-07-13	2016-09-08		2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-03	2018-03-15	2018-04-24	2018-10-26	2019-05-06	2019-11-08	2020-04-27	2020-10-27	2021-0 -16	2021-09-22
				N	FD	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix I II Parameters																							
Boron		4	mg/L	.75	0.45 J	1 J	1.1	0.6	0.44	0.45	0.87	0.91	0.66		0.72	0.76	0.71	0.73	0.68	0. 7 O	8 O	3.5	
Calcium			mg/L	00	130	120	100	82	81	95	160	150	77		170	120	140	100	128	122 O	160 O	136	
Chlor de			mg/L	28	31	31	27	28	27	27	27	25	19		24	21	22	28	25.2	95.7 O	99 3 O	9 8	
Fluor de	4	4	mg/L	.2 J	0 85 J	0.85 J	0.74 J	0.8 J	0.77 J	0.74 J	0.82 J	0.82 J	0.93 J	0.67 J	0.76 J	0.69	0.52	0.73	0.6	0.85 O	0.76 O	0.77 J-	
pH			SU	6.88		6.98	6.83	6.96	6.99	6.76	6.61	6.96	6.88	6.95	6.89	5.2	7.1	7 34	7.34	7.02 O	7.1 O	7.12	
Sulfate			mg/L	60 J-	260	260	150	140	140	160	300	330	260		410	240	380	260	227	153 O	371 O	265	
Total Dissolved Sol ds			mg/L	70	660	630	520	400	400	420	780	750	660		790	5900 O	740	640	572	556 O	770 O	675	
Appendix IV Parameters																							
Antimony	0 006	0.006	mg/L	.002 U	0 00041 J	0.002 U	0.002 U	0.002 U	0 002 U	0 002 U	0.002 U	0.002 U		0 002 U		0.002 U	0.002 U	0 002 U	0.001 U	0.001 UO	0.001 UO	0.001 U	
Arsenic	0 01	0.01	mg/L	.056	0 072	0.069	0.078	0.076	0 054	0 062	0.059	0.066		0 058		0.091	0.081	0 075	0.061	0.078 O	0.0 6 O	0.09	
Barium	2	2	mg/L	.044	0 053	0.053	0.039	0.032	0 031	0 034	0.054	0.058		0 047		0.046	0.047	0 037	0.039	0.053 O	0.058 O	0.05	
Bery lium	0 004	0.004	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.001 U	0.001 U	0 001 U	0.0002 U	0.0002 UO	0.0002 UO	0.0002 U	
Cadmium	0 005	0.005	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.001 U	0.001 U	0 001 U	0.0002 U	0.0002 UO	0.0002 UO	0.0002 U	
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0.002 U	0 00027 J	0 00028 J	0 00029 J	0 002 U	0.002 U	0.002 U		0 002 U		0.002 U	0.002 U	0 002 U	0.002 U	0.002 UO	0.002 UO	0.002 U	
Coba t		0.006	mg/L	.0019	0 0022	0.0022	0.0021	0.0019	0 0018	0 0022	0.0029	0.0027		0 0025		0.0023	0.0035	0 0017	0.0018	0.0019 O	0.003 O	0.0021	
Fluor de	4	4	mg/L	.2 J	0 85 J	0.85 J	0.74 J	0.8 J	0.77 J	0.74 J	0.82 J	0.82 J	0.93 J	0 67 J	0.76 J	0.69	0.52	0.73	0.6	0.85 O	0.76 O	0.77 J-	
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.001 U	0.001 U	0 001 U	0.001 U	0.001 UO	0.001 UO	0.001 U	
Lithium		0.04	mg/L	.0053 J	0 008 U	0.008 U	0.008 U	0.004 J	0 0024 J	0 0041 J	0.0058 J	0.005 J		0 0023 J		0.0054 J	0.0053 J	0 0027 J	0.008 U	0.008 UO	0.008 UO	0.01	
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 UJ		0 0002 U		0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 UO	0.0002 UO	0.0002 U	
Molybdenum		0.1	mg/L	.02	0 027	0.026	0.023	0.022	0 022	0 026	0.017	0.019		0 029		0.016	0.017	0 029	0.031	0.031 O	0.028 O	0.027	
Radium 226 228	5		pCi/L	U	0.479	0.513	0.646 U	0.555 J	0 339 U	0.483 U	0.335	0.342 U		0 657 J		0.858 J	0.476 U		1.72 U		0.191 UO		
Selenium	0 05	0.05	mg/L	.005 U	0 005 U	0.005 U	0.005 U	0.005 U	0 005 U	0 005 U	0.005 U	0.005 U		0 005 U		0.005 U	0.005 U	0 005 U	0.001 U	0.001 UO	0.0036 O	0.001 U	
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.001 U	0.001 U	0 001 U	0.001 U	0.001 UO	0.001 UO	0.001 U	
Field Parameters																							
Dissolved Oxygen			mg/L	.48		0.48	0.14	0.25	0.16	0.19	1	0.32	0.29	0 06	0.02	1.97	0.15	0.12	0.09	0.3	0.2	0.28	
Ox dation Reduct on Potential			millivolts	79 2		-60.1	-111	-114.3	-104.1	-104.4	-46.9	-43.7	-13 8	-56.8	-99.1	-254.7	-27 5	-100	-103.9	- 5.8	-6 .1	0.193	
pH			SU	6.88		6.98	6.83	6.96	6.99	6.76	6.61	6.96	6.88	6.95	6.89	5.2	7.1	7.34	7.34	7.02	7.1	7.12	
Specif c Conductivity			uS/cm	779		909	733	594	584	674	9.32	1004	901	581	933	855	730	598	950	9 1	1153	10 .8	
Temperature			deg C	5.3		20.3	19.9	14.6	12.1	11.6	14 6	16 6	18.1	10.8	10.6	17.1	8.3	15.8	11.5	22.3	1 38	19 2	
Turbidity			NTU	.48		2.96	3.41	3.98	4.4	4.92	4.2	3.1	4.11	3.98	4.29	3.1	4.9	6.9	4.51	15	9.82	6.36	

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U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
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J- = Indicates the result is estimated and may be biased low.
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UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW15B																								
				2016-07-13	2016-09-08	2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-03	2018-03-15	2018-04-24	2018-09-06		2018-10-26	2019-05-08	2019-11-08		2020-04-27	2020-10-27	2021-0 -16		2021-09-22
				N	N	N	N	N	N	N	N	N	N	N	FD	N	N	N	FD	N	N	N	FD	N	N
Appendix I I I Parameters																												
Boron		4	mg/L	_1	1.7	2	3.7	3.3	3.6	3 1	2.1	2.1		4.4		4.1	4.9	10		6.2	7 9	2.5 O	32.7 O	32 5 O	28 1
Calcium			mg/L	60	160	160	180	160	170	190	170	73		230		200	210	280		280	273	6 O	335 O	321 O	352
Chlor de			mg/L	2	58	62	81	64	65	71	64	64		87		89	93	110		80	104	613 O	372 O	396 O	269
Fluor de	4	4	mg/L	_65 J	0 62 J	0.46 J	0.74 J	0.77 J	0.75 J	0 72 J	0.61 J	0.5 J	0.69 J	0.79 J		0 6 J	0.6	0.84 J		0.89	0 84	0. 1 O	0.37 O	0 35 O	0. J-
pH			SU	7.81	7.49	7 04	7.52	7.48	7.11	7 26	7.37	7.42	7.45	7 36		7 8	6.74	7.43		7.57	7 56	6.6 O		7.15 O	7.08
Sulfate			mg/L	80 J-	390	340	500	390	460	530	540	500		790		720	770	1300		940	912	68 O	596 O	6 3 O	900
Total Dissolved Sol ds			mg/L	830	800	840	1000	890	980	1200	1100	1100		1400		1400	1400	2100		1600	1720	2170 O	17 0 O	1870 O	2030
Appendix IV Parameters																												
Antimony	0 006	0.006	mg/L	_002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U			0 002 U	0.002 U	0.002 U		0.002 U	0 001 U	0.001 UO	0.001 UO	0 001 UO	0.001 U
Arsenic	0 01	0.01	mg/L	_003 J	0 0011 J	0 0014 J	0.0022 J	0.0011 J	0.00098 J	0 00084 J	0.00081 J		0.005 U			0 005 U	0.005 U	0.00098 J		0.005 U	0 001 U	0.001 UO	0.001 UO	0 001 UO	0.001 U
Barium	2	2	mg/L	_054	0 053	0 056	0.056	0.051	0.052	0 064	0.069		0.068			0 07	0.064	0.081		0.054	0 054	0.21 O	0.18 O	0.18 O	0.17
Bery lium	0 004	0.004	mg/L	7.8E-05 J	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0 001 U	0.001 U	0.001 U		0.001 U	0 0002 U	0.0002 UO	0.0002 UO	0 0002 UO	0.0002 U
Cadmium	0 005	0.005	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0 001 U	0.001 U	0.001 U		0.001 U	0 0002 U	0.0002 UO	0.0002 UO	0 0002 UO	0.0002 U
Chromium	0.1	0.1	mg/L	_00062 J	0 002 U	0 002 U	0.00033 J	0.00034 J	0.002 U	0 002 U	0.002 U		0.002 U			0 002 U	0.002 U	0.002 U		0.002 U	0 002 U	0.002 UO	0.002 UO	0 002 UO	0.002 U
Coba t		0.006	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.00016 J	0.001 U	0 001 U	0.001 U		0.00029 J			0 00037 J	0.001 U	0.001 U		0.001 U	0 001 U	0.001 UO	0.0011 O	0 001 O	0.001 U
Fluor de	4	4	mg/L	_65 J	0 62 J	0.46 J	0.74 J	0.77 J	0.75 J	0 72 J	0.61 J	0.5 J	0.69 J	0.79 J		0 6 J	0.6	0.84 J		0.89	0 84	0. 1 O	0.37 O	0 35 O	0. J-
Lead	0 015	0.015	mg/L	_001 U	0 001 U	0 00023 J	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0 001 U	0.001 U	0.001 U		0.001 U	0 001 U	0.001 UO	0.001 UO	0 001 UO	0.001 U
Lithium		0.04	mg/L	_0069 J	0 008 U	0 008 U	0.0077 J	0.0053 J	0.0082	0 0082	0.0077 J		0.007 J			0 008	0.0096	0.012		0.0085	0 0086	0.015 O	0.011 O	0 012 O	0.026
Mercury	0 002	0.002	mg/L	_0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U			0 0002 U	0.0002 U	0.0002 U		0.0002 U	0 0002 U	0.0002 UO	0.0002 UO	0 0002 UO	0.0002 U
Molybdenum		0.1	mg/L	_011	0 013	0 01	0.012	0.015	0.014	0 014	0.012		0.011			0 01	0.011	0.012		0.01	0 012	0.001 UO	0.0012 O	0 0012 O	0.0029
Radium 226 228	5		pCi/L	_26	0 594	0 61	1.14 J	0.876 J	0.687	0 789	0.872		1.69 J			1 31	1.51 J	1.61			1 63 U		2.96 O	2.15 O	
Selenium	0 05	0.05	mg/L	_005 U	0 005 U	0 005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U		0.005 U			0 0017 J	0.005 U	0.005 U		0.005 U	0 001 U	0.001 UO	0.001 UO	0 001 UO	0.001 U
Thallium	0 002	0.002	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0 001 U	0.001 U	0.0003 J		0.001 U	0 001 U	0.001 UO	0.001 UO	0 001 UO	0.001 U
Field Parameters																												
Dissolved Oxygen			mg/L	_22	0.91	0 56	0.22	0.46	0.3	0.43	0.64	0.23	0.08	0 04		0 29	2.06	0.23		0.16	0.16	0.36		0 26	0.32
Ox dation Reduct on Potential			millivolts	129.7	-21.6	-94.6	-132 6	-81.7	-79 6	-21.3	-36.5	-42.6	-64	-102.4		-91.2	-256 1	46 3		-189.2	-98.1	-7 2		-65.7	0.16
pH			SU	7.81	7.49	7 04	7.52	7.48	7.11	7 26	7.37	7.42	7.45	7.36		7 8	6.74	7.43		7.57	7 56	6.6		7.15	7.08
Specif c Conductivity			uS/cm	834	1049	1060	1237	940	1096	1099	1110	1294	1255	1612		2757	1889	1798		1384	2359	3077		2 91	286 6
Temperature			deg C	2.71	15.9	16.1	13.9	13 6	13	13.8	14.2	14.5	13.3	13		14.13	13.6	8.1		13 8	13.9	19.8		17.6	17
Turbidity			NTU	_72	1 56	1.48	3.8	2.23	3.65	3 16	1.78	0.4	4.59	4 88		3 59	1.35	3.56		1.49	4 3	2.06		1.1	1.7

Notes:
DEM RCG= Ind ana Department of Environmental Management
Remed al on Closure Guidance Table A-6 Screening Leve s - 2021
Revision

MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
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J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW16																		GAMW16R			
				2016-07-13	2016-09-08	2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-15	2018-04-24	2018-10-29		2019-05-03	2019-11-08		2020-04-23	2020-10-29	2021-0 -22	2021-09-21	
				N	N	N	N	N	N	N	N	N	N	N	FD	N	N	FD	N	N	FD	N	N	N	
Appendix I II Parameters																									
Boron		4	mg/L	_1	1 8	1 6	1.2	0.89	1.3	1	1.4	1.1		1.4	1.4	1.4	1.6		1.9	1.1	9.6 O	9.7 O	3 6 O	_1
Calcium			mg/L	230	180	170	120	160	210	220	240	57		220	160	160	210		210	302	312 O	313 O	10 O	275
Chlor de			mg/L	3	37	30	28	24	25	28	31	42		58	36	36	28		59	21.9	55 O	155 O	81.1 O	112
Fluor de	4	4	mg/L	_4 J	1 6 J	1 3 J	1.5	1.3 J	1.3 J	1 2 J	1.3 J	1.5 J	1 J	1 2 J	1.1	1.1	0.99		1.1	0.88	5 O	0.5 O	0 39 O	0.57
pH			SU	7.92	7.18	7.48	7.5	7.58	7.17	7 36	7.06	7.62	7.41	7 67		7 28	7.46		7.8	7.79		7.21 O	7.16 O	7.1
Sulfate			mg/L	30 J-	400	320	47 O	300	500	480	630	520		530	340	350	570		530	757	20 O	698 O	1060 O	633
Total Dissolved Sol ds			mg/L	100	810	790	570	670	930	1000	1100	980		1100	740	730	1100		1100	1290	600 O	15 0 O	1850 O	1370
Appendix IV Parameters																									
Antimony	0 006	0.006	mg/L	_002 U	0 002 U	0 00028 J	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U		0.002 U	0.001 U	001 UO	0.001 UO	0 001 UO	0.001 U
Arsenic	0 01	0.01	mg/L	_011	0 0077	0 012	0.0084	0.0079	0.006	0 008	0.0096		0.002 J	0 0065	0.01	0 0098	0.005		0.0082	0.009	0059 O	0.0058 O	0 00 2 O	0.0088
Barium	2	2	mg/L	_049	0 042	0 035	0.024	0.029	0.043	0 044	0.054		0.057	0 045	0.035	0 035	0.034		0.034	0.046	097 O	0.097 O	0 07 O	0.06
Bery lium	0 004	0.004	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0 001 U	0.001 U		0.001 U	0.0002 U	0002 U	0.0002 UO	0 0002 UO	0.0002 U
Cadmium	0 005	0.005	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0 001 U	0.001 U		0.001 U	0.0002 U	0002 U	0.0002 UO	0 0002 UO	0.0002 U
Chromium	0.1	0.1	mg/L	_00062 J	0 002 U	0 002 U	0.0031	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U		0.002 U	0 002 U	0.002 U		0.002 U	0.002 U	002 UO	0.002 UO	0 002 UO	0.002 U
Coba t		0.006	mg/L	_001 U	0 00068 J	0 00051 J	0.00046 J	0.00055 J	0.00092 J	0 00094 J	0.0011		0.0013		0.00059 J	0.00061 J	0.00066 J		0.00061 J	0.0012	0039 O	0.00 O	0 006 O	0.0038
Fluor de	4	4	mg/L	_4 J	1 6 J	1 3 J	1.5	1.3 J	1.3 J	1 2 J	1.3 J	1.5 J	1 J	1 2 J	1.1	1.1	0.99		1.1	0.88	5 O	0.5 O	0 39 O	0.57
Lead	0 015	0.015	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0 001 U	0.001 U		0.001 U	0.001 U	001 UO	0.001 UO	0 001 UO	0.001 U
Lithium		0.04	mg/L	_00043 J	0 008 U	0 008 U	0.00023 J	0.008 U	0.008 U	0 008 U	0.008 U		0.008 U		0.008 U	0 008 U	0.008 U		0.008 U	0.008 U	008 UO	0.008 UO	0 008 UO	0.011
Mercury	0 002	0.002	mg/L	_0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U		0.0002 U	0 0002 U	0.0002 U		0.0002 U	0.0002 U	0002 U	0.0002 UO	0 0002 UO	0.0002 U
Molybdenum		0.1	mg/L	_024	0 036	0 045	0.044	0.03	0.027	0 023	0.024		0.027	0 031	0.033	0 033	0.027		0.028	0.022	019 O	0.019 O	0 027 O	0.019
Radium 226 228	5		pCi/L	_68	0 543	0 527 U	0.829 U	0.648	0 392 U	0 339 U	0.429		0.862 J	0 29	0.862 J	1 32 J	0.685 U			1.69 U			0 968 UO	
Selenium	0 05	0.05	mg/L	_005 U	0 005 U	0 0005 J	0.0005 J	0.005 U	0.0012 J	0 005 U	0.005 U		0.0015 J		0.005 U	0 005 U	0.005 U		0.0015 J	0.001 U	0 2 O	0.0 3 O	0 001 UO	0.001 U
Thallium	0 002	0.002	mg/L	_001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0 001 U	0.001 U		0.001 U	0.001 U	001 UO	0.001 UO	0 001 UO	0.001 U
Field Parameters																									
Dissolved Oxygen			mg/L	16	0 27	0.48	0.31	0.36	0.14	0 5	0.14	0.06	0.22	0 22		1 27	0.29		4.02	0.19		0. 8	0 27	0.29
Ox dation Reduct on Potential			millivolts	18 06	711 6	-124.8	-78.8	-136.9	-73 6	-114.2	9.6	-158.4	-55.9	-106.5		-216.8	8		-2	-124.3		39.1	-78.9	0.208
pH			SU	7.92	7.18	7.48	7.5	7.58	7.17	7 36	7.06	7.62	7.41	7 67		7 28	7.46		7.8	7.79		7.21	7.16	7.1
Specif c Conductivity			uS/cm	331	1112	927	751	821	1257	1123	1406	1254	1029	1239		1046	1001		1014	1680		2098	2025	185
Temperature			deg C	5.02	18.8	18.15	12.1	9.72	10.6	15.41	18	17.8	8.71	9 2		17.81	10.5		17.52	10 3		20.	15.08	25
Turbidity			NTU	89	2.16	1.93	3.16	4.14	3.25	4 33	2.45	4.95	4.62	12.81		3.64	4.65		3.98	8.11		2.69	65	1.79

Notes:
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Revision

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O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Table 2: Analytical Results for MW21 Monitoring Wells
WBSGD Rolla M. Schaefer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GMW10B																		GMW10BR		
				2012-10-18	2016-10-26	2016-10-26	2017-04-10	2017-10-12	2018-04-26	2018-10-24	2019-04-25	2019-10-23	2020-04-29	2020-10-13	2020-10-13	2021-04-07	2021-04-20	2021-10-26	2021-10-26	2021-04-08	2021-04-08	2016-10-27	2017-04-24	2021-04-20
				N	N	FD	N	N	N	N	N	N	N	N	FD	N	N	N	FD	N	FD	N	N	N
Appendix III Parameters																								
Boron		1	mg/L	0.6	0.6	0.6	0.7	0.8	0.8	0.9	0.8	0.8	0.8	0.8		0.8	0.8	0.8		0.7	0.7	0.6	0.6	0.6
Calcium			mg/L	530	540	560	550	550	540	530	540	530		540		550	540	540		190	190	190	190	190
Chloride			mg/L	65	50	52	55	52	47	51	51	170	26			140	100	130		190	190	220	210	210
Fluoride	4	4	mg/L	0.2 J+	0.2 J	0.2 J	0.2 J	0.24 J	0.2 J	0.2 J	0.2 J	0.2 J		0.2 J		0.2 J	0.2 J	0.2 J		0.4	0.4	1	1	0.9 J
pH			SU	7.26	7.47		7.11	7.23	7.55	7.5	7.23	7.15	7.21	7.6		7.03	7.07			7.63	7.59		7.35	7.28
Sulfate			mg/L	500 J+	490	500	440	59 D	470	490	480	530				590	490	510		990	940	1500	1300	1300
Total Dissolved Solids			mg/L	1100	1000	1000	1000	1000	1000	1000	1000	1200	1100	1000		1400	20 UD	1000		1800	1800	2400	2100	1800
Appendix IV Parameters																								
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.00027 J	0.002 UJ	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U			0.00003 J		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.00094	0.0004	0.0013	0.0013	0.00102	0.00065	0.0012	0.00056	0.00147			0.00004	0.00067	0.00133			0.00102	0.00106	0.00076	0.00106	0.0008
Barium	2	2	mg/L	0.072	0.04	0.036	0.035	0.0258	0.029	0.065	0.041	0.0249			0.1059	0.035	0.0768		0.021	0.0179	0.0185	0.254	0.0147	0.041
Beryllium	0.004	0.004	mg/L	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U			0.00017 U		0.0001 U			0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U
Cadmium	0.005	0.005	mg/L	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U			0.00007 J		0.0001 U			0.0001 U	0.0001 U	0.0001 U	0.0001 U	0.0001 U
Chromium	0.1 D	0.1	mg/L	0.002 U	0.002 U	0.00029 J	0.002 UJ	0.00029 J	0.002 U	0.002 U	0.002 U	0.002 U			0.0002 U		0.002 U			0.002 U	0.002 U	0.002 U	0.002 U	0.0024
Cobalt		0.006	mg/L	0.001 U	0.00016 J	0.00018 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.00003 J		0.0001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.00117
Fluoride	4	4	mg/L	0.2 J+	0.2 J	0.6 D	0.23 J	0.0253	0.872	0.83 J	0.76 J	0.78 J	0.2		0.83 J	0.76 J	0.753 J		0.61	0.76	1	1	0.78 J	0.6
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.00053 J	0.005 U	0.0032 J	0.0022 J	0.00038 J	0.0015 J	0.0072 J	0.005 U	0.0006 J			0.0073 J		0.0039 J		0.0025 J	0.0073 J	0.0025 J	0.0025 J	0.008 U	0.013 D
Mercury	0.002	0.002	mg/L	0.00005 U	0.00013 U	0.00005 U	0.00005 U	0.00005 U	0.00005 U	0.00005 U	0.00005 U	0.00005 U			0.00005 U		0.00005 U		0.00005 U	0.00005 U	0.00005 U	0.00005 U	0.00005 U	0.00005 U
Molybdenum		0.1	mg/L	0.012	0.011	0.012	0.012	0.0122	0.014	0.0105	0.015	0.013			0.0106	0.015	0.0122		0.012	0.013	0.013	0.012	0.009	0.012
Selenium 206 + 204	0.05		mg/L	0.19	0.05	0.0965	0.0748	0.0588 J+	0.172	0.23	0.065	0.28			0.11 J+	0.09	0.1 J+		0.0414 J+	0.0494		0.5	0.5 U	0.0813
Selenium	0.05	0.05	mg/L	0.005 U	0.005 U	0.0006 J	0.005 UJ	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U			0.005 U		0.005 U		0.005 U	0.005 U	0.005 U	0.005 U	0.001 U	0.00181
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 UJ	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																								
Dissolved Oxygen			mg/L	0.21	1.61		0.19	0.23	0.77	0.32	0.27	0.19	0.05	0.08	0.25	1.09	4.01	0.21		7.41	0.14	0.47	0.28	0.31
Oxidation Reduction Potential			millivolts	122.6	89		126.9	118.5	157.3	133.2	175.1	207.7	185.8	215.5	177.8	101.5	166.9	21.2		99.5	139.6	211.2	161	212
pH			SU	7.26	7.42		7.47	7.49	7.76	7.5	7.51	7.28	7.54	7.26	7.69	7.62	7.07	7.49		7.65	7.26	7.2	7.21	7.5
Specific Conductance			uS/cm	1142	1102		1186	1201	1193	1645	1035	1663	1461	1147	1465	1044	1766	1667		2743	2835	2661	2515	2285
Temperature			deg C	10.08	14.44		15.07	13.6	13.07	10.3	12.65	14.2	15	15.6	12.8	12	17.4	11.2		14.63	12	11.2	12.84	11.6
Turbidity			NTU	3.6	8.29		0.8	2.76	1.21	1.58	0.37	0.48	0.8	0.98	0.2	1.66	0.49	0.22		0.81	0.6	0.53	0.17	0.19

Notes:
IDEM RCG - Indiana Department of Environmental Management
Remediation Closure Guidance Table A-5 Screening Levels - 2021 Revision

MCL - Maximum Contaminant Level
mg/L - milligrams per liter
SU - standard units
pCi/L - picocuries per liter
uS/cm - microSiemens per centimeter
deg C - degrees Celsius
NTU - Nephelometric Turbidity Units

"U" - Indicates the result was not detected above the method detection limit (MDL) for the sample. The associated limit (LOQ) is presented.
"D" - Indicates the result is estimated.
"J" - Indicates the result is estimated and may be biased low.
"J+" - Indicates the result is estimated and may be biased high.
"UJ" - Indicates the result was not detected above the MDL. The estimated MDL is provided.
"R" - Indicates the result was identified as an outlier and removed from the data set.

Table 2: Analytical Results for MW31 Monitoring Wells
WTPSOD Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GMW31																					
				2014-10-13	2015-05-04	2015-11-05	2016-05-03	2016-10-26	2017-05-08	2017-10-24	2018-04-30	2018-10-29	2019-04-30	2019-10-01	2019-10-31	2019-11-26	2020-05-04	2020-10-26	2021-04-26	2021-10-26	2021-11-04	2021-11-18	2021-12-02	2021-12-16	2021-12-30
				N	N	N	N	N	N	N	N	N	N	N	FD	N	FD	N	N	N	N	N	N	N	N
Appendix III Parameters																									
Boron		4	mg/L	12	12	11	11	11	8.8	7.6	12	12				5.8	5.9	10	7.2	7.0	7.0	4.2	4.3	12.5	
Calcium			mg/L	638	1400	530	1400	1400	1200	1300	1500	ns				1100	1100	1400	1300	1200	1200	1400	1400	1300	1400
Chloride			mg/L	110	1200	130	1500	1400	61	170	1400	1600				98	98	1500	90	92	92	78.4	77	170	170
Fluoride	4	4	mg/L	0.81 J+	0.91 J	0.7	0.91 J	1.6 J	1.2 J	0.97 J	0.91 J	0.94 J	0.8 U	1.0 U		0.91 J	0.9 J+	1.7	1.6 J	1.7	1.7	1.6	1.5	1.6	1.6
pH			SU	7.56	7.27	7.24	7.33	7.55	7.23	7.4	7.46	7.35			7.68		7.82	6.85	7.23	7.35	7.34	6.38	7.0	7.16	
Sulfate			mg/L	330 J+	310	290	290	290	260	320	320	360				440	420	430	420	450	450	450	390	360	460
Total Dissolved Solids			mg/L	910	910	840	1000	1100	920	1000	1000	1000				630	650	1100	800	860	860	1120	1000	938	1180
Appendix IV Parameters																									
Antimony	0.006	0.0005	mg/L	0.00081 J	0.00032 J	0.00032 J	0.002 U	0.00028 J	0.001 U	0.002 U	0.001 U			0.002 U	0.002 U			0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.001 U	0.001 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.0104	0.0108	0.0107 J	0.0135	0.0161	0.0154	0.0126 J	0.0139 J			0.0101 U	0.0101 U			0.0104 U	0.0107 U	0.0109 U	0.0109 U	0.0101 U	0.0022	0.0024	0.0027
Barium	2	2	mg/L	0.047	0.058	0.054	0.05	0.054	0.041	0.054	0.06			0.041	0.039		0.073	0.071	0.041	0.052	0.052	0.071	0.054	0.049	0.17
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Chromium	0.1	0.1	mg/L	0.0015 J	0.002 U	0.0018 J	0.003 U	0.0012 J	0.0012 J	0.002 U	0.002 U			0.0022 J	0.0017 J			0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.0019 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	4	4	mg/L	0.81 J	0.91 J	0.8	0.91 J	1.6 J	1.2 J	0.99 J	0.91 J	0.94 J	0.8 U	1.0 U		0.91 J	0.9 J+	1.7	1.6 J	1.7	1.7	1.6	1.5	1.6	1.6
Lead	0.015	0.015	mg/L	0.0001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U	0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.0017 J	0.008 U	0.0036 J	0.0017 J	0.0041 J	0.0015 J	0.0028 J	0.0076 J			0.008 U	0.0032 J			0.0066 J	0.0032 J	0.0032 J	0.008 U	0.008 U	0.008 U	0.008 U	0.021
Mercury	0.002	0.002	mg/L	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U			0.00007 U	0.00007 U			0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U	0.00007 U
Molybdenum		0.1	mg/L	0.025	0.031	0.013	0.05 U	0.03	0.032	0.018	0.021			0.021	0.023			0.02	0.017	0.017	0.017	0.02	0.018	0.015	0.014
Selenium 2% + SM	0.05		mg/L	0.559	0.457 U	0.44 U	0.571 U	0.478 U	0.422 U	0.446 U	0.75			0.574 U	0.574 U			0.515 U	0.57 U	0.571 U		0.573 U		0.571 U	
Selenium	0.05	0.05	mg/L	0.019	0.03	0.018	0.023	0.028	0.026	0.0081	0.0032 J			0.0071	0.011			0.015	0.023	0.0012 J	0.011	0.0011	0.0042	0.011	0.0036
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.005 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U	0.001 U			0.001 U	0.001 U	0.0005 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																									
Dissolved Oxygen			mg/L	0.71	1.7	1.6	1.01	0.35	1.11	1.78	4.01	1.1			4.49		1	1.46	0.15	0.47	1.31	1.24	2.02	3.75
Oxidation Reduction Potential			millivolts	29.8	875.6	6.1	83.3	6.6	69.9	23.3	8	70.9			79.2		70.2	237	33.6	35	97.9	334.5	25.8	18.2	
pH			SU	7.56	7.27	7.21	7.31	7.55	7.21	7.4	7.46	7.35			7.68		7.82	6.85	7.23	7.35	7.34	6.38	7.3	7.16	
Specific Conductivity			uS/cm	1889	1907	1447	1972	1924	1795	1969	2135	1953			1935		975	1815	1914	1961	1917	1870	1952	1958	
Temperature			deg C	17.22	20.6	19.86	17.9	19.46	19.4	17.71	14.41	20.2			19.8		23.4	20	12.6	13.62	9.41	20.4	11.95	21.9	
Turbidity			NTU	1.56	1.29	0.58	5.38	0.41	2.23	1.02	1.01	2.21			0.51		0.19	0.75	0.41	0.86	0.73	0.15	1.25	1.41	

Notes:
IDEM RCG - Indiana Department of Environmental Management
Remediation Closure Guidance Table A.5 Screening Levels - 2021 Revision

MCL - Maximum Contaminant Level
mg/L - milligrams per liter
SU - standard units
pCi/L - picocuries per liter
uS/cm - microSiemens per centimeter
deg C - degrees Celsius
NTU - Nephelometric Turbidity Units

"U" - Indicates the result was not detected above the method detection limit (MDL) for the sample, the associated limit (LOQ) is presented
"N" - Indicates the result is estimated.
"J" - Indicates the result is estimated and may be biased.
"J+" - Indicates the result is estimated and may be biased high.
"UJ" - Indicates the result was not detected above the MDL, the estimated MDL is provided
"R" - Indicates the result was identified as an outlier and removed from the statistical

Table 2: Analytical Results for MW31 Monitoring Wells
WPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMMA LTB																			
				MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181	MW-31-181
				N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix III Parameters																							
Boron		4	mg/L	38	35	20	32	22	30	26	23	18			35	35	42	42	32	37	37	18.2	23
Calcium			mg/L	230	200	140	200	210	210	240	240	240			180	200	240	230	230	240	240	152	164	192
Chloride			mg/L	160	120	100	90	200	200	71	91	130			110	120	110	130	110	110	110	105	105	100
Fluoride	4	4	mg/L	0.18 J+	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U	0.71	0.71	0.71	0.71	0.55 U	0.58 U	0.58 U	0.58 U	0.58 U	0.58 U	0.62	0.62	0.58 U	0.58 U
pH			SU	7.45	7.37	7.1	7.24	7.41	7.42	7.25	7.43	7.36	7.48	7.39	7.39	7.38	7.1	7.45	7.56	7.23	7.23	7.19	7.6
Sulfate			mg/L	1,100 J+	900	700	740	730	900	840	880	920			590	650	860	740	850	910	910	518	569	588
Total Dissolved Solids			mg/L	1600	1400	1100	1200	1700	1700	1600	1600	1600			1100	1200	1400	1400	1500	1600	1600	935	1000	1080
Appendix IV Parameters																							
Antimony	0.006	0.006	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.001 U			0.002 U			0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.001 U	0.001 U
Arsenic	0.01	0.01	mg/L	0.00694 J	0.0027 J	0.0016 J	0.0145 U	0.00351 J	0.00824 J	0.00173 J	0.00186 J			0.0027 J			0.0027 J	0.00251 J	0.00191 J	0.00178 J	0.00125	0.00222	0.0012	0.0021
Barium	2	2	mg/L	0.078	0.079	0.056	0.062	0.1	0.089	0.068	0.06			0.085	0.095		0.068	0.072	0.11	0.074	0.065	0.051	0.064	0.057
Beryllium	0.004	0.004	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U
Cadmium	0.005	0.005	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0001 U	0.00012 U	0.00012 U
Chromium	0.1	0.1	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U			0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt		0.006	mg/L	0.001 U	0.001 U	0.001 U	0.005 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U			0.0013 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.00105	0.001 U
Fluoride	4	4	mg/L	0.63 J	0.58 U	0.58 U	0.58 U	0.63 J	0.63 J	2.2 J	2.31	1.2 J		0.55 U	0.58 U		0.81 J	0.71	0.62	0.67	0.68 J	0.61	0.6	0.49 J
Lead	0.015	0.015	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	0.00173 J	0.008 U	0.008 U	0.008 U	0.00616 J	0.0082 J	0.0126 J	0.009 U			0.008 U			0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U
Mercury	0.002	0.002	mg/L	0.00067 U	0.00067 U	0.00067 U	0.00067 U	0.00067 U	0.00067 U	0.00067 U	0.00067 U			0.00067 U			0.00067 U	0.00067 U	0.00067 U	0.00067 U	0.00067 U	0.00067 U	0.00067 U	0.00067 U
Molybdenum		0.1	mg/L	0.005	0.005	0.005	0.005	0.005	0.005	0.005	0.005			0.005 U	0.005	0.005	0.005	0.005	0.005 U	0.01	0.01	0.005	0.005	0.013
Selenium (As + Se)	0.05		mg/L	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01			0.01 U	0.01	0.01	0.01 U	0.01 U	0.01 U	0.01	0.01	0.01 U	0.01 U	
Selenium	0.05	0.05	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U			0.005 U			0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U
Thallium	0.002	0.002	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U			0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Field Parameters																							
Dissolved Oxygen			mg/L	0.31	0.24	0.57	0.35	0.31	0.31	0.76	0.14	0.59	0.16	0.71	0.2	0.09	0.21	0.5	0.2	0.4	0.21	0.29	
Oxidation Reduction Potential			millivolts	110	651	109.8	115.6	91.8	107.3	98.6	91	129.4	95.2	131.5	79.5	240.5	11.9	3.6	99.1	69.7	137.5	0.317	
pH			SU	6.48	7.16	6.1	6.24	6.46	6.82	6.75	6.79	7.16	6.78	7.19	7.61	7.4	6.75	6.86	7.22	8.21	7.84	7.6	
Specific Conductivity			uS/cm	1525	1734	1560	1715.9	1951	1958	1790	1944	1932	1778	1468	1977	1308	1068	890	968	1094	1727	1501	
Temperature			deg C	10.29	10.26	10.7	10	9.96	9.95	10.61	9.69	10.8	13.2	13.9	10.35	10.3	9.49	10.16	12.12	15.8	15.09	16.1	
Turbidity			NTU	5.09	2.48	9.06	9.92	0.38	2.11	2.35	1.89	2.45	3.76	8.88	8.75	1.85	8.61	2.68	4.58	8	1.44	1.72	

Notes:
IDEM RCG - Indiana Department of Environmental Management Remediation Closure Guidance Table A-5 Screening Levels - 2021 Revision

MCL - Maximum Contaminant Level
mg/L - milligrams per liter
SU - standard units
pCi/L - picocuries per liter
uS/cm - microSiemens per centimeter
deg C - degrees Celsius
NTU - Nephelometric Turbidity Units

"J" - Indicates the result was not detected above the method detection limit (MDL) for the sample. The associated value is an estimated quantity.
"U" - Indicates the result is estimated.
"J-" - Indicates the result is estimated and may be biased low.
"J+" - Indicates the result is estimated and may be biased high.
"UJ" - Indicates the analyte was not detected above the MDL. The associated value is an estimated quantity.
"R" - Indicates the result was identified as an outlier and removed from the statistical

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW18																					
				2016-07-13	2016-09-08	2016-11-09		2017-01-10	2017-03-01	2017-04-26	2017-07-12		2017-08-23	2017-10-03		2018-03-14	2018-04-23	2018-10-25	2019-04-29	2019-11-07	2020-04-23	2020-10-23	2021-0 -20	2021-09-16
				N	N	FD	N	N	N	N	FD	N	N	FD	N	N	N	N	N	N	N	N	N	N	N
Appendix I II Parameters																									
Boron		4	mg/L	.8	3 5	1.9	1.8	1.3	1	0 77	1.2	1.2	1.5	1.9	1.9		1 2	1.7	0.95	1.7	1 2	3.6	3.1	5.9
Calcium			mg/L	20	610 O	370	360	330	280	210	280	290	300	380 J	64 J		320	230	320	360	294	3 1	36	56
Chlor de			mg/L	7	39	17	17	9.3	5	4.3	10	10	11	23	23		7.3	22	12	27	16.7	5 8	0 3	97
Fluor de	4	4	mg/L	.047 J	0 036 J	10 U	10 U	5 U	5 U	2 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	0.057	0.074	0.15	0.17	.19	0.16	0.16 J-
pH			SU	6.95	6 83		6.7	6.88	7.11	6.6		6.96	7 02		6.91	7.2	7.21	6.54	6.71	7.18	6.96	.1	10 36 O	7.1
Sulfate			mg/L	760 J-	1400	850	830	640	540	370	600	610	690	960	950		670	550	780	920	679	65	1310	1160
Total Dissolved Sol ds			mg/L	300	2200	1500	1500	1200	1000	730	1100	1100	1300	1600	1500		2400	1100	1400	1500	1130	50	1 0	2020
Appendix IV Parameters																									
Antimony	0 006	0.006	mg/L	.002 U	0 002 U	0 00096 J	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0 002 U	0 001 U	.001 U	0 001 U	0.001 U
Arsenic	0 01	0.01	mg/L	.0014 J	0 0023 J	0 0014 J	0.00091	0.0014 J	0.005 U	0 0015 J	0.0021 J	0.0021 J	0.0011 J			0.005 U		0.005 U	0.00079 J	0 005 U	0 001 U	.001 U	0 001 U	0.001 U
Barium	2	2	mg/L	.038	0 047	0 041	0.039	0.037	0.024	0 021	0.051	0.052	0 055			0.048	0.035	0.037	0.039	0 05	0 033	.053	0 0	0.057
Bery lium	0 004	0.004	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0 001 U	0 0002 U	.0002 U	0 0002 U	0.0002 U
Cadmium	0 005	0.005	mg/L	8.1E-05 J	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0 001 U	0 0002 U	.0002 U	0 0002 U	0.0002 U
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0 00067 J	0.00048 J	0.0005 J	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0 002 U	0 002 U	.002 U	0 002 U	0.002 U
Coba t		0.006	mg/L	.001 U	0 00023 J	0 00047 J	0.0002 J	0.00024 J	0.001 U	0 00023 J	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.00028 J	0 001 U	0 001 U	.001 U	0 001 U	0.0011
Fluor de	4	4	mg/L	.047 J	0 036 J	10 U	10 U	5 U	5 U	2 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	0.057	0.074	0.15	0.17	.19	0.16	0.16 J-
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0 00051 J	0.00025 J	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U			0.00067 J		0.001 U	0.001 U	0 001 U	0 001 U	.001 U	0 001 U	0.001 U
Lithium		0.04	mg/L	.00096 J	0 008 U	0 008 U	0.008 U	0.00042 J	0.008 U	0 008 U	0.008 U	0.008 U	0.008 U			0.008 U		0.008 U	0.008 U	0 008 U	0 008 U	.008 U	0 008 U	0.011
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 UJ			0.0002 U		0.0002 U	0.0002 U	0 0002 U	0 0002 U	.0002 U	0 0002 U	0.0002 U
Molybdenum		0.1	mg/L	.11	0.18 O	0.14 O	0.13 O	0.094	0.1	0 1	0.1	0.11	0.1			0.097	0 085	0.057	0.062	0 076	0 071	.079	0 082	0.1
Radium 226 228	5		pCi/L	U	0 803	0.474	0.449	0.581 U	0.398 U	0 384 U	0.493	0.327 U	0 629			0.373 U	0.259	0.477	0.365 U		1.74 U		0 538 U	
Selenium	0 05	0.05	mg/L	.01	0 018	0 0065	0.0052	0.0099	0.011	0 0053	0.012	0.012	0 006			0.009	0 0084	0.015	0.015	0 012	0 018	.03	0 0 2	0.028
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0 001 U	0 001 U	.001 U	0 001 U	0.001 U
Field Parameters																									
Dissolved Oxygen			mg/L	.83	4.77		5.93	7.52	8.86	7.79		6.04	4 52		5.32	6.5	8.49	3.78	7.01	2.95	5.6	6.58	6 82	5.39
Ox dation Reduct on Potential			millivolts	98.9	76.8		28.7	106.8	97.9	209.2		203.2	24.7		121.9	-129.6	-51.6	-36.6	129.2	-41 1	241 3	320 6	-6 3	56.8
pH			SU	6.95	6 83		6.7	6.88	7.11	6.6		6.96	7 02		6.91	7.2	7.21	6.54	6.71	7.18	6.96	.1	10 36	7.1
Specif c Conductivity			uS/cm	474	2362		1740	1255	986	970		1299	1414		1760	905	1170	1230	1060	1338	995	921	1699	2 5 9
Temperature			deg C	6.3	20.1		16 6	9.65	8.47	11.2		17.9	19.8		19.3	8.1	8.9	17.4	8.8	14.2	9.18	7	10 29	21.
Turbidity			NTU	32	1 63		2.38	3.05	4.44	2.48		1.71	1 03		4.16	4.59	0.71	1.29	4.55	2 04	1 33	8	2 8	3.7

Notes:
DEM RCG= Ind ana Department of Environmental Management
Remed al on Closure Guidance Table A-6 Screening Leve s - 2021 Revision

MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the result is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW18B												GAMW46											
				2018-09-10	2018-10-25		2019-04-29	2019-11-07	2020-04-23	2020-10-23	2021-0 -21	2021-09-17				2018-06-13	2019-03-01	2019-04-17	2019-06-06	2019-07-18	2019-08-26	2019-10-04	2019-11-19	2020-04-21	2020-10-19	2021-0 -27	2021-09-15	
				N	FD	N	N	N	N	N	N	FD	N			N	N	N	N	N	N	N	N	N	N	N	N	
Appendix III Parameters																												
Boron		4	mg/L	3	12	13	14	11	10.9	9	8	8.2	8 2			0 055 JO	0.1 U	0.033 J	0.1 U	0 032 J	0.053 J	0.043 J	0.049 J	0.1 U	0.1 U	0.1 U	0.1 U	
Calcium			mg/L	260	200	220	240	180	299	301	317	325	323			56 O	14	28	25 J-	25	25	23	27	24.5	22.7	29.1	29 3	
Chlor de			mg/L	50	140	140	170	140	117	11	112	85.8	86 3			8.4 O	2.4	1.9		1 8	1.6	1.6	1.6	1 6	1.3	2.1	2.1	
Fluor de	4	4	mg/L	.77 J	0.74	0.73	0.88	0.99	0.91	0 8	0.35	0.6	0 6			0 052 JO	0.068	0.063		0 065	0.06	0.079 J	0.062	0 062	0.05 U	0.078	0.11	
pH			SU	7.73		6.86	7.15	7.68	7.21	7. 3	7 51		7 3			7.93	8.17	8.23	7.52	8 15	7.9	7 81	7.77	8 64	8.67	8.36	8.16	
Sulfate			mg/L	100	1000	1100	1100	840	1220	12 0	1260	1100	1120			55 O	34	30		28	29	30	27	24.7	23 9	33 J	31 8	
Total Dissolved Sol ds			mg/L	2100	2000	2000	2100	1500	2060	1830	33 0	1930	2010			260 O	160	150		130	150	140 J	140	101	85	112	137	
Appendix IV Parameters																												
Antimony	0 006	0.006	mg/L	.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			0 002 UO	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 001 U	0.001 U	0.001 U	0.001 U	
Arsenic	0 01	0.01	mg/L	.0018 J	0 0026 J	0.0028 J	0.0037 J	0.0041 J	0.0029	0 0025	0.0025	0.0028	0 0027			0 0014 JO	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U	0.00086 J	0.005 U	0 001 U	0.001 U	0.001 U	0.001 U	
Barium	2	2	mg/L	.048	0 035	0.039	0.039	0.024	0.041	0 032	0.0 1	0.028	0 029			0 027 O	0.0028 J	0.0059	0.0065	0 0054	0.0054	0.0049 J	0.0059	0 0053	0.00 6	0.005	0.00	
Bery lium	0 004	0.004	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U			0 001 UO	0.005 U	0.001 U	0.001 U	0 001 U	0.001 U	0.00054 J	0.001 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	
Cadmium	0 005	0.005	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U			0 001 UO	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U			0 002 UO	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.0014 J	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	
Coba t		0.006	mg/L	.00027 J	0 00026 J	0.00028 J	0.00024 J	0.00024 J	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			0 0002 JO	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	
Fluor de	4	4	mg/L	.77 J	0.74	0.73	0.88	0.99	0.91	0 8	0.35	0.6	0 6			0 052 JO	0.068	0.063		0 065	0.06	0.079 J	0.062	0 062	0.05 U	0.078	0.11	
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			0 001 UO	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	
Lithium		0.04	mg/L	.025	0 015	0.016	0.023	0.015	0.026	0 03	0.037	0.031	0 028			0 008 UO	0.04 U	0.008 U	0.008 U	0 008 U	0.008 U	0.008 U	0.008 U	0 008 U	0.008 U	0.008 U	0.008 U	
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U			0 0002 UO	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	
Molybdenum		0.1	mg/L	.024	0 014	0.015	0.026	0.011	0.039	0 05	0.07	0.03	0 031			0 0031 JO	0.01	0.01 U	0.01 U	0 01 U	0.01 U	0.0015 J	0.01 U	0 001 U	0.001 U	0.001 U	0.001 U	
Radium 226 228	5		pCi/L	.7	1 28	1.46			1.7 U		2.1					0 384 UO	0.486 U	0.33 U		0 427 U	0.505 U	0.566		1.7 U		1.28 U		
Selenium	0 05	0.05	mg/L	.005 U	0 005 U	0.005 U	0.005 U	0.005 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			0 001 JO	0.025 U	0.005 U	0.005 U	0 005 U	0.005 U	0.005 U	0.005 U	0 001 U	0.001 U	0.001 U	0.001 U	
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U			0 001 UO	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.00059 J	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	
Field Parameters																												
Dissolved Oxygen			mg/L	.24		0.29	0.92	0.36	0.18	0 35	0.25		0.19			0.12	1.85	4.18	6.44	6 58	4.03	2.44	3.36	3.42	.78	1.59	1.26	
Ox dation Reduct on Potential			millivolts	140.7		-103.4	109.2	-144.8	-77.7	15.9	-10 5		0.192			-171.4	1.9	7.7	157 6	25.5	40.6	9.16	-141.1	125 6	127	109.8	-130	
pH			SU	7.73		6.86	7.15	7.68	7.21	7. 3	7.51		7 3			7.93	8.17	8.23	7.52	8 15	7.9	7.81	7.77	8 64	8.67	8.36	8.16	
Specif c Conductivity			uS/cm	311		2147	1902	1475	1897	26 6	2 9		2 7.3			367	155	161	179	153	153	152	132	208	175.1	238.2	238	
Temperature			deg C	5.39		14.9	11 8	13.7	12.1	15.2	12.15		15 8			11.4	8	9.1	11.1	13.2	14.2	14.8	11.7	8 3	13 5	10.7	15.1	
Turbidity			NTU	2.78		3.58	3.21	3.14	2.35	3 28	19		59			3.96	1.91	1.33	0.51	0 82	0.69	0.89	0.66	2.18	3.02	1.73	3.21	

Notes:
DEM RCG= Ind ana Department of Environmental Management
Remed al on Closure Guidance Table A-6 Screening Leve s - 2021 Revision

MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the result is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW46B													GAMW52							
				2018-06-13	2019-03-04	2019-04-17	2019-06-07	2019-07-18	2019-08-26	2019-10-04	2019-11-19	2020-04-21	2020-10-19	2021-0 -27	2021-09-15	2018-09-10	2018-10-3	2019-05-09	019-11-1	2020-04-30	2020-10-22	2021-0 -16	2021-09-30
				N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix I II Parameters																							
Boron		4	mg/L	.05 JO	0 05 J	0 037 J	0.047 J	0.03 J	0.05 J	0 047 J	0.046 J	0.1 U	0.1 U	0.1 U	0.1 U	0.34	0.17	0.077 J	0.13	0.1 U	0.1	0.1	0.1
Calcium			mg/L	25 O	58	58	56	52	58	49	56	53.8	51	5 .3	51	75	59	52	72	48.3	71.	59.9	62 5
Chlor de			mg/L	O	7.9	7.9		7.2	8	7 1	6.9	5.5	6	5 5	5.	34	9.1	5.5	37	8.2	9.1	18.7	15 9
Fluor de	4	4	mg/L	.048 JO	0 066	0 076		0.072	0.069	0 073 J	0.072	0.084	0 058	0 077	0.12	0.36 J	0.3	0.25 J	0.3	0.29	0.26	0.22	0 31
pH			SU	8.2	7.11	7.99	7.58	8.18	7.62	7.44	7.47	8.08	7 97	7 69	7.73	7.5	7.06	7.17	7.59	7.98	7.82	7.5	7 6
Sulfate			mg/L	29 O	64	64		64	68	65	64	58.8	60 5	61 6 J	55 3	86	39	24	67	21.6	58.6	55.8	50.1
Total Dissolved Sol ds			mg/L	50 O	260	290		240	220 J	250	240	209	197	190	2 3	400	250	240	350	205	336	269	276
Appendix IV Parameters																							
Antimony	0 006	0.006	mg/L	.002 UO	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.001 U	0 001 U	0 001 U	0 001 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.001 U	0.001 U	0 001 U
Arsenic	0 01	0.01	mg/L	.0015 JO	0 0012 J	0 00076 J	0 006 U	0.00091 J	0 00095 J	0 0013 J	0.001 J	0.001 U	0 001 U	0 001 U	0 001 U	0.005 U	0.005 U	0.005 U	0.005 U	0.001 U	0.001 U	0.001 U	0 001 U
Barium	2	2	mg/L	.0086 O	0 027	0 026	0.025	0.023	0.024	0 021	0.025	0.025	0 023	0 025	0 023	0.039	0.019	0.015	0.02	0.013	0.01	0.011	0 01
Bery lium	0 004	0.004	mg/L	.001 UO	0 0011	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.0011	0.0002 U	0 0002 U	0 0002 U	0 0002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Cadmium	0 005	0.005	mg/L	.001 UO	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.0002 U	0 0002 U	0 0002 U	0 0002 U	0.001 U	0.00024 J	0.001 U	0.001 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Chromium	0.1	0.1	mg/L	.0021 O	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0 002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U
Coba t		0.006	mg/L	.00034 JO	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0 001 U	0 001 U	0.00058 J	0.00031 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Fluor de	4	4	mg/L	.048 JO	0 066	0 076		0.072	0.069	0 073 J	0.072	0.084	0 058	0 077	0.12	0.36 J	0.3	0.25 J	0.3	0.29	0.26	0.22	0 31
Lead	0 015	0.015	mg/L	.001 UO	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0 001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Lithium		0.04	mg/L	.008 UO	0 0017 J	0 008 U	0.008 U	0.002 J	0.008 U	0 008 U	0.003 J	0.008 U	0 008 U	0 008 U	0 008 U	0.0017 J	0.008 U	0.008 U	0.0025 J	0.008 U	0.008 U	0.008 U	0 008 U
Mercury	0 002	0.002	mg/L	.0002 UO	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum		0.1	mg/L	.0018 JO	0 0024 J	0 0022 J	0.0025 J	0.0028 J	0.0028 J	0 0025 J	0.003 J	0.0021	0 0022	0 0018	0 0018	0.005 J	0.0035 J	0.0016 J	0.0017 J	0.0012	0.0022	0.0021	0 0025
Radium 226 228	5		pCi/L	.392 UO	0.402 U	0 308 U		0.427 U	0.609 U	0.408 U		1.68 U		1 65 U		0.796	1 1	0.53 U		1.64 U		0.23 U	
Selenium	0 05	0.05	mg/L	.0017 JO	0 005 U	0 005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U	0.001 U	0 001 U	0 001 U	0 001 U	0.0014 J	0.0017 J	0.0014 J	0.0011 J	0.001 U	0.0011	0.0011	0 001 U
Thallium	0 002	0.002	mg/L	.001 UO	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00068 J	0.001 U	0 001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Field Parameters																							
Dissolved Oxygen			mg/L	.59	0 08	1.9	0.3	1.4	1.25	0 31	0.3	0.17	1.1	0 6	0 2	0.48	0.21	6.42	2.2	6.9	0.35	0.91	0 56
Ox dation Reduct on Potential			millivolts	29.4	111.9	-111.1	-133 1	-93.9	-119.9	33.7	-229 6	-137.1	- 0 5	-101.3	-2 1	-30.3	85.1	108.2	-43 2	165 6	227 8	-23.1	0 38
pH			SU	8.2	7.11	7.99	7.58	8.18	7.62	7.44	7.47	8.08	7 97	7 69	7.73	7.5	7.06	7.17	7.59	7.98	7.82	7.5	7.6
Specif c Conductivity			uS/cm	211	268	294	282	274	284	260	242	405	358 9	351	388	0.896	448	308	320	389	6 1	5 5	501
Temperature			deg C	1.3	9 6	10.8	11	11.9	12.3	12.3	11.3	10	11 7	11 37	12 2	19.97	17.6	14.2	15.3	10.9	19	12	20
Turbidity			NTU	.45	3 26	4 3	3.25	3.11	1.15	4 16	2.84	4.02	69	58	3	0.45	0.83	0.42	0.74	1.57	1.09	1.79	1 39

Notes:
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Remed al on Closure Guidance Table A-6 Screening Leve s - 2021 Revision

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mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the resul t is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW52B								GAMW53								
				2018-09-11	2018-10-31	2019-05-09	2019-11-14	2020-04-30	2020-10-23	2021-0 -16	2021-09-30	2018-09-11	2018-10-30	2019-04-30	2019-11-14	2020-05-01	2020-10-23		2021-0 -16	2021-09-30
				N	N	N	N	N	N	N	N	N	N	N	N	N	FD	N	N	N
Appendix I II Parameters																				
Boron		4	mg/L	.75	0 8	1	1.3	0.77	1.7	1 2	0.6	0.19	0.25	0 056 J	0.13	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Calcium			mg/L	60	160	110	130	129	1 .2	9 .9	120	45	53	17	25	32	16.9	17	17.5	28.3
Chlor de			mg/L	30	470	380	370	496	2 .8	131	135	4.9	4.6	1.9	3.6	4.3	1.8	2	2.	2 7
Fluor de	4	4	mg/L	0 U	0.18	0 21 J	0.23	0.26	0.26	0 2	0.38	0.17 J	0.17	0 05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
pH			SU	8.3	7.1	7.42	7.34	7.6	7.29	7. 6	7.57	6	6.47	5.93	6.21	6.42		5.88	5.76	6.17
Sulfate			mg/L	210	190	220	290	216	259	181	196	51	56	37	36	32 6	26 6	28 2	35.2	9.
Total Dissolved Sol ds			mg/L	500	1300	1100	1100	1260	982	673	667	240	250	130	160	161	89	99	97	1 7
Appendix IV Parameters																				
Antimony	0 006	0.006	mg/L	.002 U	0 002 U	0 002 U	0.002 U	0.001 U	0.001 U	0 001 U	0.001 U	0.002 U	0.002 U	0 002 U	0.00061 J	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Arsenic	0 01	0.01	mg/L	.0013 J	0 0016 J	0 00083 J	0 0012 J	0.0011	0.001 U	0 0011	0.0011	0.013	0.015	0 00097 J	0 0018 J	0.0015	0.001	0 001	0.0012	0 0012
Barium	2	2	mg/L	.32	0 31	0 25	0.28	0.29	0.23	0.15	0.1	0.027	0.028	0 019	0.026	0.023	0.022	0 023	0.027	0 033
Bery lium	0 004	0.004	mg/L	.001 U	0 00042 J	0 001 U	0.001 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.001 U	0.001 U	0 001 U	0.001 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Cadmium	0 005	0.005	mg/L	.001 U	0 00029 J	0 001 U	0.001 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.001 U	0.001 U	0 001 U	0.001 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.0019 J	0.0018 J	0 0012 J	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U
Coba t		0.006	mg/L	.001 U	0 00032 J	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.00084 J	0.00099 J	0 0005 J	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Fluor de	4	4	mg/L	0 U	0.18	0 21 J	0.23	0.26	0.26	0 2	0.38	0.17 J	0.17	0 05 U	0.05 U	0.05 U	0.05 U	0 05 U	0.05 U	0 05 U
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.0014	0.00089 J	0 00057 J	0.00063 J	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Lithium		0.04	mg/L	.0041 J	0 0031 J	0 0033 J	0.0071 J	0.0086	0.008 U	0 008 U	0.008 U	0.008 U	0.008 U	0 008 U	0.0021 J	0.008 U	0.008 U	0 008 U	0.008 U	0 008 U
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U
Molybdenum		0.1	mg/L	.014	0 015	0 0095 J	0.0086 J	0.016	0.015	0 013	0.011	0.012	0.015	0 0051 J	0.011	0.0068	0.0066	0 0066	0.0052	0 0097
Radium 226 228	5		pCi/L	.52	5 55 J	2 63		2.44		1 05 U		0.547 U	1.45 J	0 344 U		1.9 U			0 U	
Selenium	0 05	0.05	mg/L	.005 U	0 005 U	0 005 U	0.005 U	0.001 U	0.001 U	0 001 U	0.001 U	0.005 U	0.005 U	0 005 U	0.005 U	0.001 U	0.001 U	0 001 U	0.001 U	0 0019
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U
Field Parameters																				
Dissolved Oxygen			mg/L	.44	0.1	0.15	0.19	0.09	1.02	0. .2	0.28	0.53	0.86	3.11	0.84	1.39		1.16	1.99	0 92
Ox dation Reduct on Potential			millivolts	214.9	-103.5	6 31	-102.9	-104.2	-1 1 6	-123.5	0.2 1	-24.6	-199.5	43.7	-54.8	168		122.8	111.7	9 .9
pH			SU	8.3	7.1	7.42	7.34	7.6	7.29	7. 6	7.57	6	6.47	5.93	6.21	6.42		5.88	5.76	6.17
Specif c Conductivity			uS/cm	934	2005	1652	1353	2424	1 00	1159	110.	307	400	125	155	260		1	173	20
Temperature			deg C	7.26	16.6	15.3	16.1	15 3	17.1	15 8	18	21.3	20.1	11.4	17.5	13 3		19	13	20.
Turbidity			NTU	.6	0 88	2 35	1.01	4.92	2.36	3 9	1.27	9.93	5.17	4.76	4.8	4.8		2.19	.56	51

Notes:
DEM RCG= Ind ana Department of Environmental Management
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MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the resul t is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW53B								GAMW54							
				2018-09-11	2018-10-3	2019-04-30	2019-11-14	2020-05-01	2020-10-23	2021-0 -16	2021-09-30	2018-09-10	2018-10-31	2019-04-30	2019-11-14	2020-05-04	2020-10-23	2021-0 -19	2021-10-01
				N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Appendix I II Parameters																			
Boron		4	mg/L	2.5	3.1	2.2	0.73	3.3	2 5	1 9	2.7	0 84	0.77	0.39	0.37	0.42	0.72	0.5	0.63
Calcium			mg/L	80	190	150	140	180	136	1 .2	128	93	88	93	81	131	15	16	11
Chlor de			mg/L	90	85	81	74	107	8 .6	8 .8	66	15	10	10		12.3	50.3	53.9	2 6
Fluor de	4	4	mg/L	.52 J	0.46	0.51	0.7	0.46	0 58	0.	0. 6	0.18 J	0.17	0.14	0.28	0 18	0.28	0.2	0.3
pH			SU	7.3	7 35	7.41	7 52	7.48	7 39	7.28	7. 8	6 24	7 92	6.82	7.08	6 74	6.21	6.52	6.82
Sulfate			mg/L	30	510	340	320	488	327	30	295	190	150	190	76	284	3 .1	92	191
Total Dissolved Sol ds			mg/L	100	1100	900	770	1060	730	7 8	802	500	400	470	50	618	689	735	506
Appendix IV Parameters																			
Antimony	0 006	0.006	mg/L	.002 U	0 002 U	0.002 U	0.002 U	0.001 U	0 001 U	0.001 U	0 001 U	0 0011 J	0.00074 J	0.00078 J	0.001 J	0 001 U	0.0011	0.001 U	0.001 U
Arsenic	0 01	0.01	mg/L	.00079 J	0 00083 J	0.001 J	0.0016 J	0.0028	0 001 U	0.001 U	0 001	0 0024 J	0.0028 J	0.0022 J	0.0045 J	0 0045	0.0038	0.0075	0.02
Barium	2	2	mg/L	.052	0 054	0.044	0.072	0.099	0 061	0.067	0 051	0 043	0.039	0.031	0.031	0 052	0.068	0.071	0.0 8
Bery lium	0 004	0.004	mg/L	.001 U	0 001 U	0.00059 J	0.001 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0 001 U	0.001 U	0.001 U	0.001 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U
Cadmium	0 005	0.005	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0 001 U	0.001 U	0.001 U	0.001 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U
Coba t		0.006	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0 00053 J	0.00052 J	0.00062 J	0.001 U	0 001 U	0.001 U	0.0011	0.001 U
Fluor de	4	4	mg/L	.52 J	0.46	0.51	0.7	0.46	0 58	0.	0. 6	0.18 J	0.17	0.14	0.28	0 18	0.28	0.2	0.3
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U
Lithium		0.04	mg/L	.0042 J	0 0052 J	0.005 J	0.0066 J	0.011	0 008 U	0.008 U	0 008 U	0 008 U	0.008 U	0.008 U	0.0023 J	0 008 U	0.008 U	0.008 U	0.008 U
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum		0.1	mg/L	.0083 J	0 0075 J	0.0098 J	0.02	0.016	0 011	0.015	0 011	0 043	0.044	0.023	0.03	0 014	0.023	0.011	0.025
Radium 226 228	5		pCi/L	.69	0.48 J	1.26		1.73		1.21 U		0 5	1.08 J	0.393 U		1 51 U		0.69 U	
Selenium	0 05	0.05	mg/L	.005 U	0 005 U	0.005 U	0.005 U	0.001 U	0 001 U	0.001 U	0 001 U	0 0017 J	0.0012 J	0.0043 J	0.0035 J	0 0043	0.0029	0.00	0.001 U
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0.00049 J	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U
Field Parameters																			
Dissolved Oxygen			mg/L	.26	0 8	0.36	0 09	0.12	0 65	0.39	0 2	0 61	1.41	0.72	.26	0 65	1.0	0.68	0.29
Ox dation Reduct on Potential			millivolts	183.2	-168	27.7	-75 3	-118.9	-111 8	-10	-232 6	107.8	-294 7	48.4	-69 5	24.5	67.5	81.2	-153 9
pH			SU	7.3	7 35	7.41	7 52	7.48	7 39	7.28	7. 8	6 24	7 92	6.82	7.08	6 74	6.21	6.52	6.82
Specif c Conductivity			uS/cm	954	1620	1160	870	1634	1091	1227	125 6	675	630	493	74	960	875	1097	782
Temperature			deg C	20.89	20.4	18.7	19.7	20.2	19.5	17 6	20	21.2	18.53	10 5	15.3	11.4	17	11.8	20.1
Turbidity			NTU	2.43	3	3.45	2 5	7.86	03	3.27	3 62	2 03	1	3.24	2.31	4.9	2. 5	6.79	3.79

Notes:
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pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the result is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW54B								GAMW55				GAMW55R				
				2018-09-10	018-10-3	2019-05-01	2019-11-15	020-05-0	2020-10-23	2021-0 -19	2021-10-01	2018-09-10		2018-10-29		2019-11-15	2020-05-05	2020-10-28	2021-0 -20	2021-10-01
				N	N	N	N	N	N	N	N	FD	N	FD	N	N	N	N	N	N
Appendix I II Parameters																				
Boron		4	mg/L	.6	6 5	5.9	6	2.7	2.2	3.1	3.1	1.9	1.9	1 8	1.8	1.1	0.96	0.95	0 87	1.7
Calcium			mg/L	210	220	200	240	214	195	236	190	260	250	270	260	180	169	170	237	197
Chlor de			mg/L	00	95	110	120	68.3	9 2	83 9	70	58	59	69	70	61	46 3	8 2 J-	51.	.1
Fluor de	4	4	mg/L	.41 J	0 52	0 59	0.58	0.54	0.59	0.53	0 52	0.51 J	0 52 J	0.47	0.47	0.62	0.52	0.63	0. 6	0.51
pH			SU	6.95	8.71	7 27	7 2	7.43	6.97	7.3	7 36		6.77		7.04	7.31	7.51	7. .5	7 6	7.27
Sulfate			mg/L	750	730	710	720	470	38	891	501	590	600	630	620	480	345	351	867	389
Total Dissolved Sol ds			mg/L	600	1400	1500	1400	1000	878	1120	1030	1200	1300	1300	1300	950	846	789	8 2	9 8
Appendix IV Parameters																				
Antimony	0 006	0.006	mg/L	.002 U	0 002 U	0 002 U	0 002 U	0.001 U	0 001 U	0.001 U	0 001 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.001 U	0 001 U	0.001 U
Arsenic	0 01	0.01	mg/L	.0025 J	0 0032 J	0 0045 J	0.005	0.0042	0 00 2	0.00	0 00	0.00683 J	0 005 U	0.005 U	0.005 U	0.005 U	0.001 U	0.001 U	0 001 U	0.001 U
Barium	2	2	mg/L	.098	0 093	0 08	0.084	0.06	0.05	0.063	0 056	0.099	0 097	0 068	0.069	0.035	0.046	0.038	0 032	0.038
Bery lium	0 004	0.004	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Cadmium	0 005	0.005	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0 002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U
Coba t		0.006	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.0065	0 0058	0.0044	0.0044	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Fluor de	4	4	mg/L	.41 J	0 52	0 59	0.58	0.54	0.59	0.53	0 52	0.51 J	0 52 J	0.47	0.47	0.62	0.52	0.63	0. 6	0.51
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Lithium		0.04	mg/L	.0048 J	0 0036 J	0 0048 J	0.0074 J	0.008 U	0 008 U	0.008 U	0 008 U	0.0021 J	0 0017 J	0.008 U	0.008 U	0.0035 J	0.008 U	0.008 U	0 008 U	0.01
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Molybdenum		0.1	mg/L	.018	0 019	0 0085 J	0.012	0.018	0.029	0.017	0 025	0.03	0 028	0.026	0.026	0.024	0.02	0.025	0 013	0.017
Radium 226 228	5		pCi/L	2.03	2 7 J	1 82		1.41 U		1. 3		1.4	0 802	0.922 J	1.24 J		1.58 U		1. 7 R	
Selenium	0 05	0.05	mg/L	.005 U	0 005 U	0 005 U	0.005 U	0.001 U	0 001 U	0.001 U	0 001 U	0.0037 J	0 0031 J	0.0027 J	0.0027 J	0.0046 J	0.0045	0.0028	0 0029	0.00 6
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.00021 J	0 001 U	0.00023 J	0.00022 J	0.00022 J	0.001 U	0.001 U	0 001 U	0.001 U
Field Parameters																				
Dissolved Oxygen			mg/L	.42	2.12	0.42	0.31	0.1	0.72	0. .5	0 26		1.73		0.33	0.72	1.95	2.5	1.19	0. .7
Ox dation Reduct on Potential			millivolts	123.4	-315.7	-23.1	-43.3	117.5	-1 3.2	-105.3	-211.7		21.6		-69.4	-28.9	148.6	12 8	32 3	-16.8
pH			SU	6.95	8.71	7 27	7 2	7.43	6.97	7.3	7 36		6.77		7.04	7.31	7.51	7. .5	7 6	7.27
Specif c Conductivity			uS/cm	816	1983	1636	1310	0.63	1105	1626	1 9.		1493		1574	1017	1270	99	1319	139.1
Temperature			deg C	7.6	17.29	15.5	15 8	15.6	16 2	1 3	17.3		21.1		19.4	16.7	12 8	17 6	11 3	20.6
Turbidity			NTU	2	1 64	4.49	1.67	4.31	.6	6.7	3 5		1.74		0.66	2.26	2.4	1.2	2 35	1.59

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pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the result is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
N IPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW558										GAMW56							
				2018-09-11		2018-10-29	2019-05-01	2019-11-15	2020-05-05		2020-10-28	2021-0 -20	2021-10-01	2018-09-11	2018-10-26	2019-04-29	2019-11-15	020-05-0	2020-10-28	2021-0 -20	2021-10-0
				FD	N	N	N	N	FD	N	N	N	N	N	N	N	N	N	N	N	N
Appendix I II Parameters																					
Boron		4	mg/L	7.1	7.4	8 2	9.1	11	0.21 J	10.9 J	10 8	9 9	8 3	0.26	0.28	0.21	0.2	0.22	0.3	0.23	0.19
Calcium			mg/L	250	250	260	210	210	116 J	219 J	226	25	205	130	110	91	120	115	111	130	108
Chlor de			mg/L	220	220	190	170	150	119	119	120 J-	120	79.	3.1	2.4	3.2	2.1	2.8	3.2 J-	2.9	1 7
Fluor de	4	4	mg/L	.29 J	10 U	0 25	0.31	0.31	0.33	0 32	0.28	0 3	0 3	1.2 J	0.99	0.53	0.71	0.66	0.83	0.05 U	1
pH			SU		7.07	7.19	7.31	7.46		7.45	7.56	7 7	7	6.82	7.17	6.83	7.06	7.05	7.07	7.05	7 09
Sulfate			mg/L	820	820	910	790	750	676	674	720	985	96	57	63	54	56	56.3	9 6	57 6	6 8
Total Dissolved Sol ds			mg/L	800	1900	1800	1700	1400	1400	1420	1380	1370	1120	470	480	420	440	456	390	80	379
Appendix IV Parameters																					
Antimony	0 006	0.006	mg/L	.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.001 U	0 001 U	0.001 U	0 001 U	0 001 U	0.002 U	0.002 U	0.002 U	0.002 U	0.001 U	0.001 U	0.001 U	0 001 U
Arsenic	0 01	0.01	mg/L	.0014 J	0 0011 J	0 005 U	0.005 U	0.005 U	0.0079 J	0 001 UJ	0.001 U	0 001 U	0 001 U	0.019	0.022	0.011	0.0097	0.0076	0.0059	0.007	0 0018
Barium	2	2	mg/L	.14	0.14	0 12	0.074	0.067	0.045 J	0 067 J	0.06	0 061	0 05	0.068	0.049	0.044	0.04	0 047	0.0	0.0 2	0 0
Bery lium	0 004	0.004	mg/L	.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0 0002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Cadmium	0 005	0.005	mg/L	.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0 0002 U	0.001 U	0.001 U	0.001 U	0.001 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Chromium	0.1	0.1	mg/L	.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U
Coba t		0.006	mg/L	.00034 J	0.00028 J	0 001 U	0.001 U	0.001 U	0.0087 J	0 001 UJ	0.001 U	0 001 U	0 001 U	0.0017	0.0053	0.0084	0.0081	0.0092	0.01	0.016	0 00 5
Fluor de	4	4	mg/L	.29 J	10 U	0 25	0.31	0.31	0.33	0 32	0.28	0 3	0 3	1.2 J	0.99	0.53	0.71	0.66	0.83	0.05 U	1
Lead	0 015	0.015	mg/L	.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Lithium		0.04	mg/L	.0064 J	0.0064 J	0 0054 J	0.0055 J	0.0078 J	0.008 U	0 013	0.008 U	0 008 U	0 012	0.0034 J	0.0039 J	0.0023 J	0.0053 J	0 008 U	0.008 U	0.008 U	0 008 U
Mercury	0 002	0.002	mg/L	.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0 0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum		0.1	mg/L	.0057 J	0.0055 J	0 0055 J	0.0046 J	0.005 J	0.009 J	0 0053 J	0.0062	0 0068	0 0058	0.013	0.0094 J	0.0072 J	0.0079 J	0 0093	0.0093	0.0083	0 011
Radium 226 228	5		pCi/L	.35	9.18	9 66 J	2.08		3.06	3 02		1 . 9 U		0.728	0.698 J			1.24 U		0.222 U	
Selenium	0 05	0.05	mg/L	.005 U	0.005 U	0 005 U	0.005 U	0.005 U	0.002	0 001 U	0.001 U	0 001 U	0 001 U	0.005 U	0.005 U	0.005 U	0.005 U	0.0022	0.001 U	0.0011	0 001 U
Thallium	0 002	0.002	mg/L	.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U
Field Parameters																					
Dissolved Oxygen			mg/L		0.37	0 17	0.11	0.17		0.1	1.37	0 65	0 26	0.99	0.28	1.3	0.34	0.21	1.88	1	0 37
Ox dation Reduct on Potential			millivolts		-129 5	-115.9	-57.5	-137.9		-101.9	-130.1	-97 3	-213.9	-97.4	-95.4	64	-86.6	-42.1	-6 .	85 9	-133.7
pH			SU		7.07	7 19	7.31	7.46		7.45	7.56	7 7	7.	6.82	7.17	6.83	7.06	7.05	7.07	7.05	7 09
Specif c Conductivity			uS/cm		2109	2201	1967	1491		2018	1588	1896	162 3	749	835	460	466	782	560	7 0	655
Temperature			deg C		19 2	18 5	18 1	17 9		17 1	17 2	15 3	18 7	17	15 7	8 7	14	9 6	1 . 7	9	17 2
Turbidity			NTU		4.38	1 74	4.77	3.92		4.11	3.22	78	. 8	2.91	2.99	2.31	2.01	2.4	0.83	2.67	3. 8

Notes:
DEM RCG= Ind ana Department of Environmental Management
Remed al on Closure Guidance Table A-6 Screening Leve s - 2021 Revision

MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
SU = standard units
pCi/L = picoCuries per iter
uS cm = microSiemens per cen imeter
deg C = degrees Celsius
NTU = Nepholomet c Turbidity Units

U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the result is estimated.
J- = Indicates the result is estimated and may be biased low.
J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Tab e 2: Analytical Results for MCU Monitoring Wells
NIPSCO Rollin M. Schahfer Generat ng Station
Wheatfield, Indiana

Analyte	MCL	IDEM RCG	Unit	GAMW56B							
				2018-09-11	2018-10-29	2019-04-29	2019-11-15	2020-05-05	2020-10-28	2021-0 -21	2021-10-0
				N	N	N	N	N	N	N	N
Appendix I II Parameters											
Boron		4	mg/L	.2	1 2	2 3	3.2	2.1	2	1 6	1.
Calcium			mg/L	40	140	150	150	141	138	157	160
Chlor de			mg/L	0	36	55	64	50 8	5.7 J-	70 8	73.7
Fluor de	4	4	mg/L	.41 J	0 33	0.4	0.44	0.55	0.51	0. 1	0. 6
pH			SU	6.95	6.91	7 08	7.21	7.52	7. 7	7 55	7.3
Sulfate			mg/L	70	130	260	360	280	275	277	268
Total Dissolved Sol ds			mg/L	740	690	830	860	753	696	738	802
Appendix IV Parameters											
Antimony	0 006	0.006	mg/L	.002 U	0 002 U	0 002	0.002 U	0.001 U	0.001 U	0 001 U	0.001 U
Arsenic	0 01	0.01	mg/L	.005 U	0 005 U	0 005	0.005 U	0.001 U	0.001 U	0 001 U	0.001 U
Barium	2	2	mg/L	.076	0 072	0 082	0.076	0.071	0.066	0 071	0.081
Bery lium	0 004	0.004	mg/L	.001 U	0 001 U	0 001	0.001 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Cadmium	0 005	0.005	mg/L	.001 U	0 001 U	0 001	0.001 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Chromium	0.1	0.1	mg/L	.002 U	0 002 U	0 002	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U
Coba t		0.006	mg/L	.001 U	0 001 U	0 001	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Fluor de	4	4	mg/L	.41 J	0 33	0.4	0.44	0.55	0.51	0. 1	0. 6
Lead	0 015	0.015	mg/L	.001 U	0 001 U	0 001	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Lithium		0.04	mg/L	.0051 J	0 0035 J	0 0044	0.0062 J	0.0082	0.008 U	0 008 U	0.0091
Mercury	0 002	0.002	mg/L	.0002 U	0 0002 U	0 0002	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U
Molybdenum		0.1	mg/L	.004 J	0 003 J	0 0031	0.0064 J	0.0086	0.0075	0 007	0.0062
Radium 226 228	5		pCi/L	.26	1 28 J			2.11		2 97	
Selenium	0 05	0.05	mg/L	.005 U	0 005 U	0 005	0.005 U	0.001 U	0.001 U	0 001 U	0.001 U
Thallium	0 002	0.002	mg/L	.001 U	0 001 U	0 001	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U
Field Parameters											
Dissolved Oxygen			mg/L	.29	0 26	0.79	0.18	0.09	1. 8	0 23	0.29
Ox dation Reduct on Potential			millivolts	102.8	-44.4	31.8	-105 7	-105.5	-123.9	-110.5	-21 .1
pH			SU	6.95	6.91	7.08	7.21	7.52	7. 7	7 55	7.3
Specif c Conductivity			uS/cm	928	1036	856	741	1179	772	1100	12
Temperature			deg C	13.9	13.8	11.6	12.9	11 8	12 9	12	1 .3
Turbidity			NTU	2.96	1.45	4.77	1.4	4.56	2.39	8.72	.65

Notes:
DEM RCG= Ind ana Department of Environmental Management
Remed al on Closure Guidance Table A-6 Screening Leve s - 2021 Revision

MCL= Maximum Contaminant Level
mg/L = mil igrams per iter
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U = Indicates the resu t was not detected above the method detection lim t (MDL) for the sample; the quanti ation lim t (RL) s prov ded.
J = Indicates the resul t is estimated.
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J = Indicates the resu t is estimated and may be biased high.

UJ = Indicates the result was not detected above the MDL, the estimated RL s provided.
O = Indicates te result was dentif ed as an outlier and removed from the da a set.

Prepared by: SLG
Checked by: DFSC
Reviewed by: MAH

Table 3: General Groundwater Response Actions
CCR Unit Schahfer MSRB, MCWB, and DA
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

General Response Action	Comments	Corrective Measure Area	
		Below CCR Unit	Downgradient of CCR Unit
Limited Action	Access Restrictions Institutional Controls Use Restrictions Environmental Monitoring Monitored Natural Attenuation	X	X
Containment	Physical	X	
Removal	Extraction	X	X
Treatment	In-Situ Ex-Situ	X	X
On-Site Disposal	Surface Water Discharge Groundwater Discharge POTW Discharge	X	X
Off-Site Disposal	Permitted Disposal Facility	X	X

Notes:
X - General Response Action Selected for further screening at the indicated Corrective Measure Area

Prepared by: DFS
Checked by: KMC
Reviewed by: MAH

GOLDER
MEMBER OF WSP

Table 4 Initial Screening of Corrective Measure Alternatives / Process Options for Groundwater
CCR Unit Schahfer MSRB, MCWB, and DA
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

General Response Action	Remedial Technology	Process Option	Description	Screening Comments	Retained for Further Evaluation
Limited Action	Institutional Controls	Permitting and Notices	Administrative controls to restrict groundwater use.	Potentially implementable.	Yes
		Access Restrictions	Physical restrictions or structures that prevent access by unauthorized persons.	Potentially implementable.	Yes
	Monitoring	Groundwater Monitoring	Periodic sampling and analyses of groundwater as a means of detecting unacceptable changes in constituent concentrations.	Potentially implementable.	Yes
	Use Restriction	Deed Restrictions	Administrative controls to provide future land use	Potentially implementable.	Yes
	Monitored Natural Attenuation	Monitored Natural Attenuation	Long-term monitoring of natural attenuation, including advection/dispersion/adsorption and biotic and abiotic degradation/transformation, of the inorganic constituents dissolved in groundwater; advection/dispersion/adsorption of inorganics.	Potentially implementable.	Yes
Containment	Physical Containment	Capping	Low-permeable cap covering the source area.	Potentially implementable, minimizes stormwater infiltration reducing the potential for plume migration.	No
		Vertical Barriers	Vertical barriers including slurry walls and sheet piling placed around the area of contamination to contain groundwater.	Potentially implementable, reduces potential for plume migration.	No
Removal	Extraction	Extraction Wells	Use of extraction wells to extract contaminated groundwater and control groundwater movement within capture zone.	Potentially implementable, results in physical removal of dissolved constituents of concern and reduces potential for plume migration.	Yes
		Extraction Trench	Removal of groundwater by pumping from extraction trenches.	Potentially implementable, results in physical removal of dissolved constituents of concern and reduces potential for plume migration.	Yes
In Situ Treatment	Stabilization/ Solidification	Solidification	Blending soil with grout to contain and immobilize contaminated groundwater.	Potentially implementable. Reduces potential for plume migration.	Yes
	Permeable Reactive Barrier	Vertical Reactive Barrier	Construction of vertical reactive barrier (e.g., zero-valent iron or carbon wall) to treat groundwater as it flows through the treatment zone.	Potentially implementable, results in physical removal of dissolved constituents of concern by treatment media changeout and reduces potential for plume migration.	Yes
In Situ Treatment	Chemical Addition/ Treatment	Chemical Precipitation	Increasing inorganic precipitation through chemical injection, either by changing site geochemical conditions (i e., pH, Eh, or ionic strength) or the addition of a co-precipitate that reacts with or acts as an adsorbent for the COC.	Non-permanent - does not remove contaminant mass.	No
		Chemical Reduction	Injection of a reducing agent such as nanoscale or microscale zero valent iron into groundwater. Reduction reactions chemically convert constituents to non-hazardous or less toxic compounds that are more stable, less mobile, and/or inert.	Non-permanent - does not remove contaminant mass.	No
	Biological Treatment	Bioremediation	Use of microorganisms to oxidize/reduce metal contaminants directly or by the production of chemical oxidizing/reducing agents.	Not effective on all Site COCs.	No
Ex Situ Treatment	On-Site Treatment Facility	On-Site, Various Physical/chemical Process Options	Extracted groundwater is pumped to the on-Site treatment facility (physical/chemical treatment).	Potentially implementable to treat extracted contaminated groundwater. Treatment processes that could remediate the Site COCs include chemical/physical precipitation, activated carbon, and reverse osmosis.	Yes
Disposal	On-Site Discharge	On-Site Discharge to Surface Water	Treated groundwater discharged to local water body pursuant to updated NPDES permit.	Potentially implementable. Treated landfill leachate is currently discharged to a local water body pursuant to a NPDES permit.	Yes
		On-Site Discharge to Groundwater	Treated groundwater discharged to groundwater within the Station Area.	Potentially implementable.	Yes
		POTW Discharge	Discharge of treated groundwater to POTW under a discharge authorization.	No access to POTW.	No
	Off-Site Treatment	Off-Site Disposal/Treatment of Collected Groundwater	Transport and treatment of extracted groundwater at off-Site treatment facility.	Not retained due to higher safety concerns and much higher disposal costs.	No

Notes
COC- constituent of concern
NPDES- National Pollutant Discharge Elimination System
POTW- publicly owned treatment works
NA- not applicable

Prepared by DFS
Checked by: KMC
Reviewed by: MAH

**Table 5: Summary of Groundwater Corrective Measure Alternatives
For Multi-Cell Unit (MSRB, MCWB, and DA)
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana**

Alternative		Key Components
A	Monitored natural attenuation	Permitting Implementation of deed restrictions Environmental monitoring
B	Vertical barrier/hydraulic controls and monitored natural attenuation	Permitting Implementation of deed restrictions Installation of hydraulic controls within existing vertical barrier wall *Ex situ* treatment of pumped groundwater by an on-Site treatment facility Disposal of treated groundwater to on-Site surface water or groundwater NPDES permit or installation of injection wells and UIC permit Long-term maintenance Environmental monitoring
C	Pump-and-treat and monitored natural attenuation	Permitting Implementation of deed restrictions Installation of monitoring wells or extraction trench immediately downgradient of the slurry wall *Ex situ* treatment of pumped groundwater by an on-Site treatment facility Disposal of treated groundwater to on-Site surface water or groundwater NPDES permit or of injection wells and UIC permit Long-term maintenance Environmental monitoring
D	Vertical barrier and monitored natural attenuation	Permitting Implementation of deed restrictions Installation of permeable reactive barrier – simple trench or funnel and gate Long-term maintenance Environmental monitoring
E	In-Situ Stabilization and monitored natural attenuation	Permitting Implementation of deed restrictions Stabilization of plume area using Portland cement, pozzolans, and/or bentonite Environmental monitoring

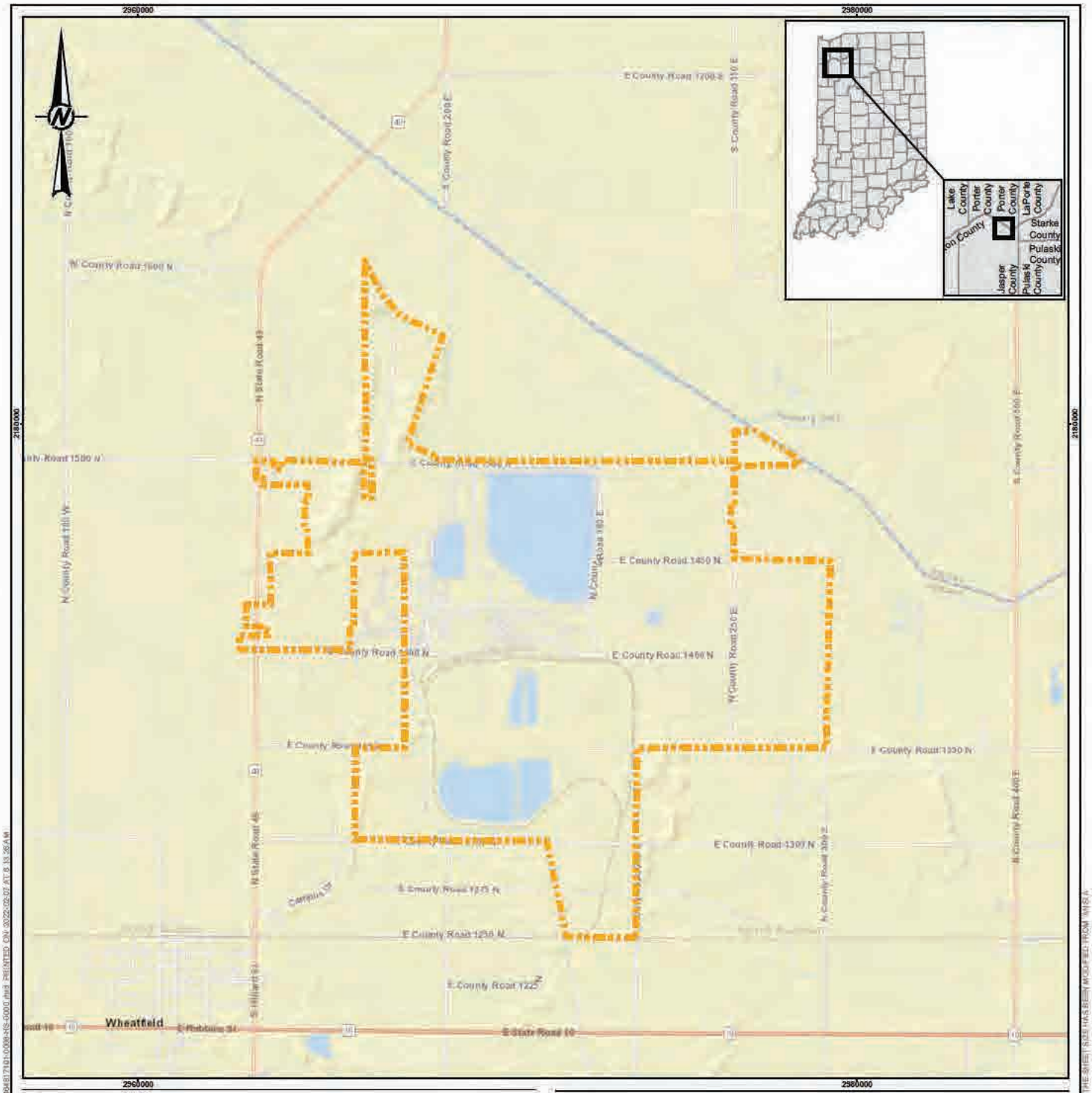
Note:
All alternatives also include impoundment closure by removal with associated dewatering

Prepared by: JBG
Checked by: CMJ
Reviewed by: JBG

Table 6 Evaluation of Groundwater Corrective Measure Alternatives
For Multi-Cell Unit (MSRB, MCWB, and DA)
NIPSCO Rollin M. Schahfer Generating Station
Wheatfield, Indiana

	Corrective Measure Alternatives				
	Alternative A	**Alternative B**	**Alternative C**	**Alternative D**	**Alternative E**
Evaluation Criteria	**Monitored natural attenuation**	**Vertical barrier/hydraulic controls and monitored natural attenuation**	**Pump-and-treat and monitored natural attenuation**	**Permeable reactive barrier and monitored natural attenuation**	**In-situ stabilization and monitored natural attenuation**
Performance	Initial review of site conditions indicates plume stability and confirmation of attenuation and immobilization, therefore, monitored natural attenuation could be effective in reducing the COC concentrations and mobility. Relative short-term effectiveness varies depending on success of excavation to remove the source material and the low-permeability cap to reduce the mobility of residual COCs and potential for plume migration. Minimally effective short-term. Relatively effective long-term. Functions through physical and chemical mechanisms. Contaminant mass is removed from groundwater through adsorption and co-precipitation, but is not removed from the environment and could be remobilized following changes to groundwater geochemistry.	Hydraulic controls generating an inward gradient within the existing vertical barrier (slurry wall) are an effective means of containing the source area and reducing/eliminating downgradient migration of cobalt-contaminated groundwater from the MCU. Relatively effective both short-term and long-term.	Groundwater extraction of contaminated groundwater would be effective in reducing contaminant mass, volume, and mobility of dissolved COCs in groundwater. Relatively effective both short-term and long-term.	A permeable reactive barrier installed with an appropriate treatment media placed downgradient of the MCU in the path of the cobalt groundwater plume would be effective at removing contaminant mass and preventing further downgradient migration. Contaminant mass is removed from the environment through media changeout. Relatively effective both short-term and long-term.	In-situ stabilization of the groundwater plume would be effective at reducing mobility of contaminants. Contaminant mass is not removed, but is effectively permanently sequestered from the environment. Relatively effective both short-term and long-term.
Reliability	Moderate to High. No O&M required, but long-term changes to geochemistry may impact attenuation.	Moderate. Some O&M required and potential treatment replacement.	Moderate, some O&M required and potential treatment replacement.	Moderate, some O&M required and potential treatment replacement.	High, no O&M required apart from monitoring.
Ease of mplementation	Already occurring.	Technology is common; some installation challenges expected based on existing slurry walls and proposed cap.	Technology is common, some installation and drilling challenges expected.	Technology is common; installation would be extremely challenging due to the high density of subsurface utilities to the north of the MCU.	Technology is common; installation would be extremely challenging due to the high density of subsurface utilities to the north of the MCU.
Potential Impacts	Minimal potential for impacts to surface water and off-site groundwater.	Hydraulic controls within an existing vertical barrier control cross media impacts outside of the wall. Some safety concerns related to drilling wells and operating treatment plant (e g., regenerating resin).	Groundwater collection and treatment will reduce long-term downgradient cross media impacts. Some safety concerns related to drilling wells and operating treatment plant (e.g., regenerating resin).	Groundwater treatment will reduce long-term downgradient cross media impacts. Safety concerns related to excavation for construction.	Subsurface agitation during installation could mobilize sorbed contaminants. Potential high pH conditions due to cement/bentonite required for stabilization.
Time Requirements	Relatively long, no active remediation.	Moderate, should be shorter than MNA alone.	Moderate, should be shorter than MNA alone.	Moderate, should be shorter than MNA alone, but longer than pump-and-treat as the PRB uses the natural groundwater gradient as a driving force compared to the higher induced gradient from the extraction wells.	Installation would be longer than any of the other alternatives, but implementation would then be substantially complete save for long-term monitoring.
nstitutional Requirements	Low permitting requirements	May require NPDES permit modifications or UIC permit, overall low permitting requirements	May require NPDES permit modifications or UIC permit, overall low permitting requirements	May require Underground Injection Control permit.	Low permitting requirements

Prepared by: JBG
Checked by: CMJ
Reviewed by: JBG



LEGEND

Approximate Property Line

0 0.75 1.5

1 " = 0.75 miles Miles

REFERENCE(S)

SERVICE LAYER CREDITS: SOURCES: ESRI, HERE, GARMIN, USGS, NTERMAP, INCREMENT P, NRCAN, ESRI JAPAN, METI, ESRI CH NA (HONG KONG), ESRI KOREA, ESRI (THAILAND), NGCC, (C) OPENSTREETMAP CONTR BUTORS, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

SITE LOCATION MAP

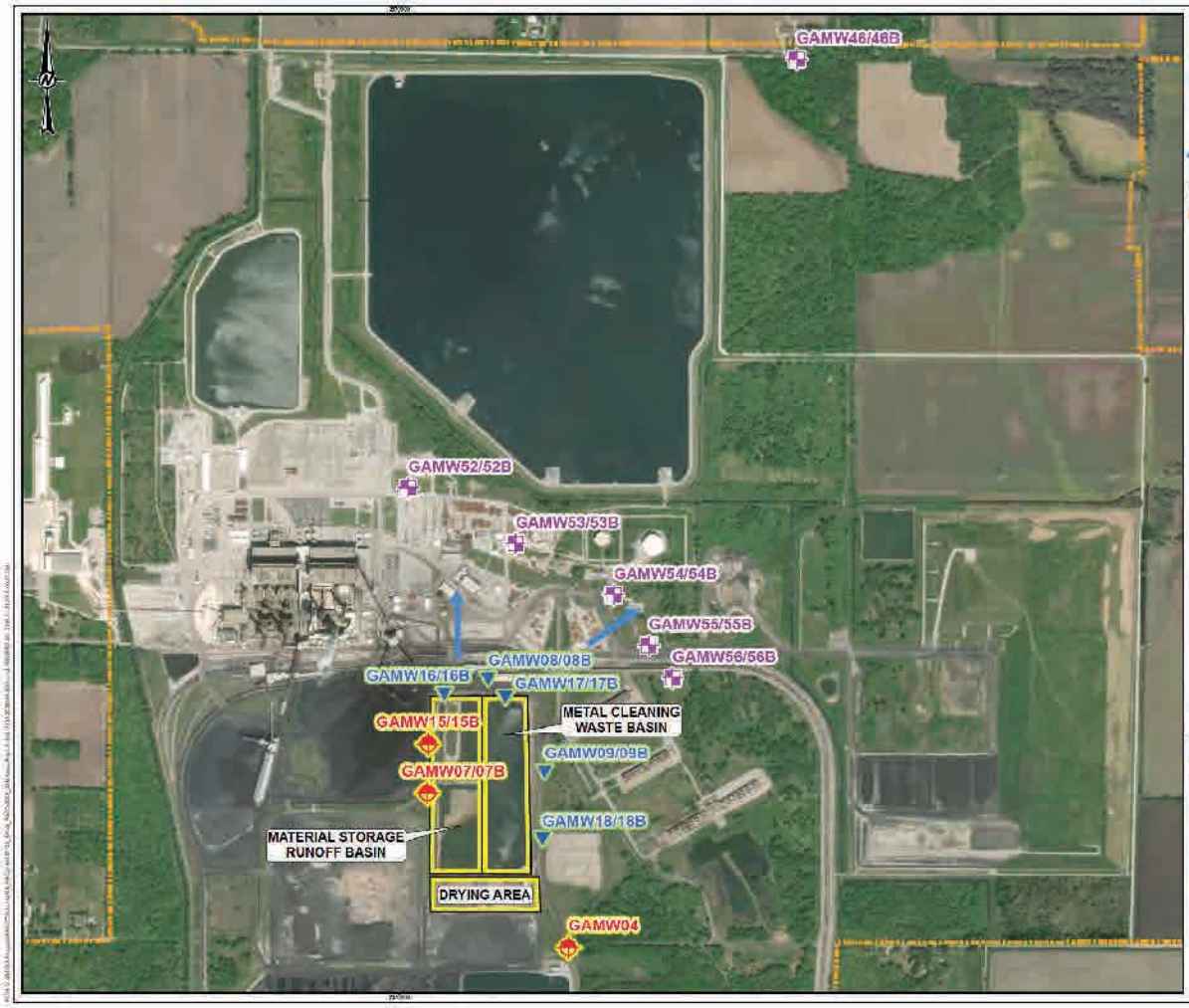
CONSULTANT

GOLDER
MEMBER OF WSP

YYYY-MM-DD	2/7/2022
DESIGNED	DFS
PREPARED	SHL
REVIEWED	JSP
APPROVED	MAH

PROJECT NO.	CONTROL	REV.	FIGURE
20447130	A	0	1

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI A



Legend

- Assessment Monitoring Well
- Background Monitoring Well
- Downgradient Monitoring Well
- Generalized Groundwater Flow Direction
- CCR Units
- Approximate Property Line

0 850 1,700

1 in = 850 feet

NOTE(S)

1. THIS FIGURE DEPICTS THE GENERALIZED GROUNDWATER FLOW DIRECTION WITHIN THE UPPER PORTION OF THE SURFICIAL AQUIFER.

REFERENCE(S)

1. SERVICE LAYER CREDITS: SOURCE: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRID, IGN, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY

PROJECT

NORTHERN INDIANA PUBLIC SERVICE COMPANY
R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

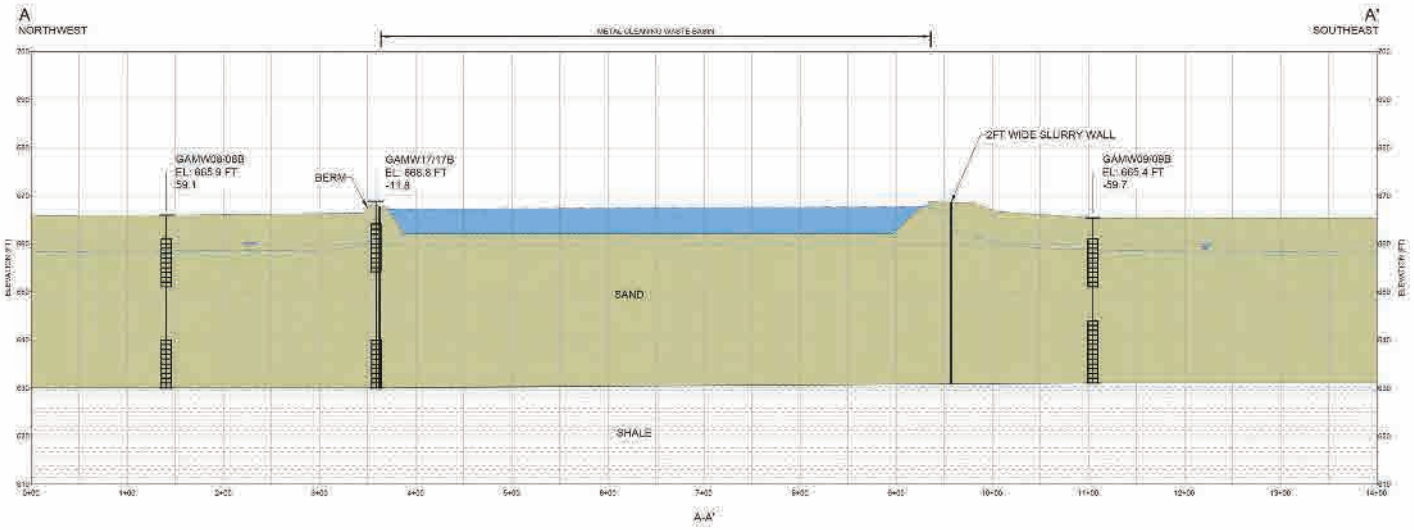
MONITORING WELL LOCATIONS
DRYING AREA, MSRB, AND MCWB

CONSULTANT

GOLDER
MEMBER OF WSP

TYPED/MM/DD	08/22/12
DESIGNED	DPS
PREPARED	SIE
REVIEWED	MAH
APPROVED	MHH

PROJECT NO. 20447130 | CONTROL A | REV. 0 | FIGURE 2





VERTICAL SCALE: 1" = 10' (0, 10, 20 FEET)

HORIZONTAL SCALE: 1" = 50' (0, 50, 100 FEET)

LEGEND

GAMW-23/23B
EL: 663.9
59.1

- WELL ID
- GROUND SURFACE ELEVATION
- OFFSET DISTANCE
- C/L = CENTERLINE
- GROUNDWATER ELEVATION
- WELL SCREEN
- END OF BORING LOCATION
- IMPOUNDMENT WATER
- SAND
- SHALE

NOTE(S)

1. GEOLOGIC CONTACTS ILLUSTRATED BETWEEN AND BELOW BORINGS ARE INFERRED AND SHOULD NOT BE INTERPRETED AS EXACT INDICATORS OF GEOLOGIC CONDITIONS AT, BETWEEN, OR BELOW BORINGS.

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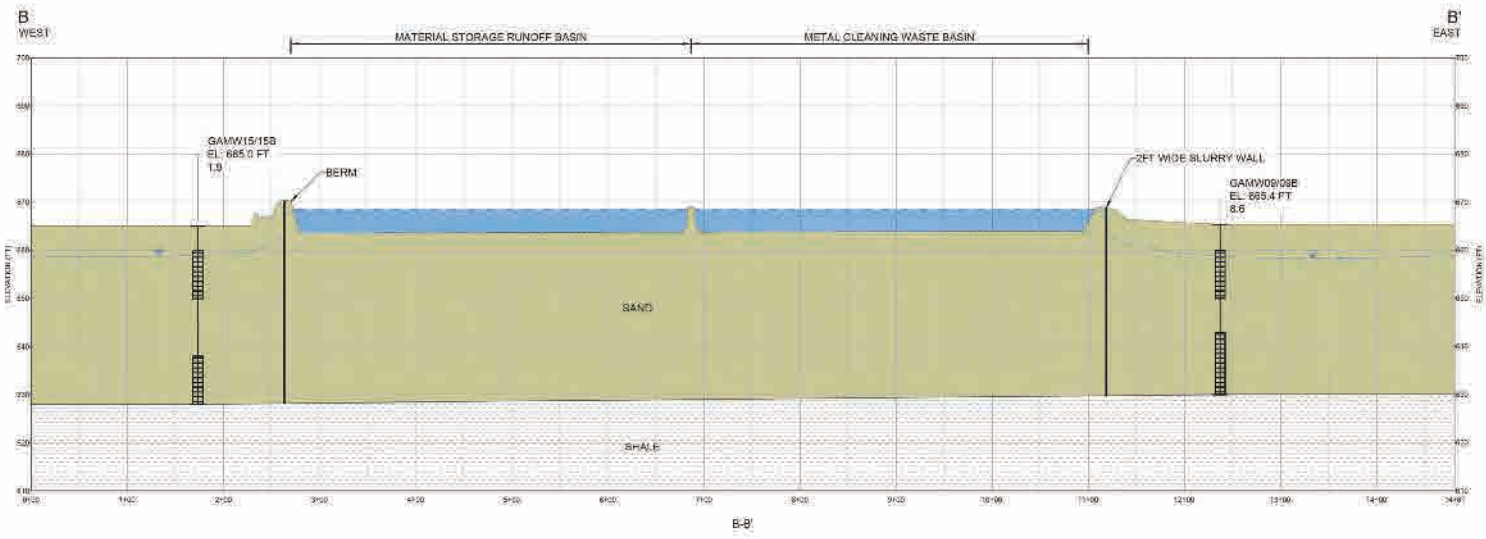
CONSULTANT
GOLDER
ASSOCIATES OF WAR

YYYY-MM-DD	2020-03-31
PREPARED	RWC
REVIEWED	RWC
REVIEWED	JBG
APPROVED	MAH

PROJECT
NORTHERN INDIANA PUBLIC SERVICE COMPANY
ROLLIN M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE
GEOLOGIC INTERPRETATION
CROSS SECTION A-A'

PROJECT NO.	CONTROL	REV.	FIGURE
20447130	03	0	3





VERTICAL SCALE: 0 10 20 FEET

HORIZONTAL SCALE: 0 50 100 FEET

LEGEND

GAMW-15/15B
EL. 665.0 ft
1.9

- WELL ID
- GROUND SURFACE ELEVATION
- OFFSET DISTANCE C/L = CENTERLINE
- GROUNDWATER ELEVATION
- WELL SCREEN
- END OF BORING LOCATION
- IMPOUNDMENT WATER
- SAND
- SHALE

NOTE(S)

1. GEOLOGIC CONTACTS ILLUSTRATED BETWEEN AND BELOW BORINGS ARE INFERRED AND SHOULD NOT BE INTERPRETED AS EXACT INDICATORS OF GEOLOGIC CONDITIONS AT, BETWEEN, OR BELOW BORINGS.

CLIENT
NORTHERN INDIANA PUBLIC SERVICE COMPANY

CONSULTANT
GOLDER
MEMBER OF WSP

YYYY-MM-DD	2020-03-31
PREPARED	RWC
REVIEWED	RWC
REVIEWED	JBC
APPROVED	MKH

PROJECT
NORTHERN INDIANA PUBLIC SERVICE COMPANY
ROLLIN M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE
GEOLOGIC INTERPRETATION
CROSS SECTION B-B'

PROJECT NO.	CONTROL	REV.	FIGURE
20447130	03	0	4



LEGEND

- Background Monitoring Well
- Downgradient Monitoring Well
- Non-CCR Well
- Surface Water Location
- September 2021 Groundwater Elevation Contour (0.5 ft Interval)
- Slurry Wall
- Approximate Property Line
- CCR Units
- Inactive Retired Waste Disposal Basin
- Phase VII

0 500 1,000

1" = 958 feet

Feet

NOTE(S):

1. THE DIRECTION OF HORIZONTAL GROUNDWATER FLOW AT AND NEAR THE POTENTIOMETRIC SURFACE CAN BE GENERALLY INTERPRETED AS BEING PERPENDICULAR TO THE GROUNDWATER ELEVATION CONTOURS (SOLID OR INFERRED) REPRESENTED ON THIS MAP.
2. THE ACTUAL ELEVATION OF THE POTENTIOMETRIC SURFACE IS LIKELY MORE HETEROGENEOUS THAN SHOWN AND ACTUAL CONDITIONS MAY VARY. OTHER INTERPRETATIONS ARE POSSIBLE. THE DEPTH TO GROUNDWATER IS KNOWN TO VARY WITH TIME.

NOTE(S):

1. "MW" INDICATES LOCATION WAS NOT SURVEYED.
2. "-" INDICATES NOT USED IN CONTOUR NO.

REFERENCE(S):

1. SERVICE LAYER CREDITS: SOURCE: ESRI, MAXAR, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRID, IGN, AND THE GIS USER COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

MONITORING WELL LOCATIONS AND GROUNDWATER ELEVATION CONTOURS (SEPTEMBER 2021)

CONSULTANT

GOLDER
MEMBER OF WSP

DESIGNED	DPS
PREPARED	NH
REVIEWED	EAA
APPROVED	MAH

PROJECT NO.	CONTROL	REV.	FIGURE
20447130	A	0	5



LEGEND

0.015 September 2021 Cobalt Concentration (mg/L)

Assessment Monitoring Well

Background Monitoring Well

Downgradient Monitoring Well

Septemeber 2021 Shallow Cobalt Contour (mg/L)

Generalized Groundwater Flow Direction

Slurry Wall

CCR Units

FIGURE NARRATIVE

THIS FIGURE SHOWS THE INTERPRETED COBALT ISOCONCENTRATION CONTOURS WITHIN GROUNDWATER ANALYTICAL DATA FROM THE SEPTEMBER 2021 SAMPLING EVENT FOR SHALLOW WELLS SCREENED IN THE SURFICIAL AQUIFER. THE ISOCONCENTRATION CONTOURS ARE INTENDED TO DEPICT THE INTERPRETED DISTRIBUTION OF COBALT IN GROUNDWATER ON THE BASIS OF THE DATA PLOTTED. THE DISTRIBUTION IS LIKELY MORE HETEROGENEOUS THAN SHOWN, AND THE ACTUAL CONDITIONS WILL VARY. ALL INTERPRETATIONS ARE SUBJECT TO CHANGE AS DISTRIBUTION IS GROUNDWATER IS KNOWN TO VARY WITH TIME.

NOTE(S)

1. THIS FIGURE DEPICTS THE GENERALIZED GROUNDWATER FLOW DIRECTION WITHIN THE UPPER PORTION OF THE SURFICIAL AQUIFER.
2. ALL VALUES SHOWN ARE IN MILLIGRAMS PER LITER (MG/L).

REFERENCE(S)

1. BASEMAP LAYER SERVICES SOURCED FROM: IMAGE_SERVICE: ESRI USA10 GEOGRAPHICS, ESRI SWITZERLAND, ESRI, USGS, ESRI GERMANY, ESRI, AND ESRI, DELORME COMMUNITY

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

R.M. SCHAHFER GENERATING STATION
WHEATFIELD, INDIANA

TITLE

COBALT ISOCONCENTRATION CONTOUR MAP SEPTEMBER 2021 (SHALLOW)

CONSULTANT

GOLDER
MEMBER OF WSP

DESIGNED	CMJ
PREPARED	JWJ
REVIEWED	DMJ
APPROVED	AMH

PROJECTION: 20447130 | REVISION: A | REV: 0 | FIGURE: 6

APPENDIX A

Volume Calculations

Contaminant Mass Within Cobalt Plume

Assumptions:

Plume extents are as shown on Figure 6.

Plume extends from average depth to water in September 2021 in nearby monitoring wells (GAMW-08, GAMW-17, etc…) at 8.50 feet bgs, to top of screened interval of deep wells (GAMW-08B, GAMW-17B, etc…) at 27.5 feet bgs for a asturated thickness of 18.37 feet.

Soil porosity estimated at 0.16 to 0.42.

Only the mass of contaminants in portions of the plume exceeding the GWPS (10 μg/l) estimated

1 cubic foot = 28.32 liters

Contour areas calculated by Surfer.

Volume calculation: Volume = Area between contours * saturated thickness * porosity

Mass calculation: Mass = volume * concentration * 28.32 liters/cubic foot * 1x10-9 kg/μg

Contour Value (μg/l)	Area between contours (ft^2)	Volume at Porosity 0.16 (ft^3)	Volume at Porosity 0.42 (ft^3)	Cobalt Mass at Porosity 0.16 (kg)	Cobalt Mass at Porosity 0.42 (kg)
10	19071	56052	147137	0.017	0.046
11	14287	41994	110233	0.014	0.037
12	10726	31527	82757	0.012	0.030
13	8256	24265	63695	0.010	0.025
14	7753	22788	59819	0.010	0.025
15	3611	10613	27858	0.005	0.013
16	536	1576	4137	0.001	0.002
17	472	1389	3645	0.001	0.002
18	75	221	581	-	-
			Total	**0.07**	**0.18**

Volume of impacted material below the CCR Unit

Assumptions:

Entire remaining volume of water within the slurry walls after excavation is impacting.
Area is estimated by the combined area of the three impoundments (Figure 6).
Depth is estimated by the approximate saturated thickness outside the slurry walls (Figure 3).

Area	36.2 acre	(A)	(Wood 2019)
Saturated depth	32 feet	(D)	(Golder 2017)

Estimated volume of impacted material was calculated using the following formula:

$Volume = A*D = V_1$ 1 acre = 43560 ft^2

V_1 1158 acre-ft

V_1 5.0E+07 ft^3

Volume of impacted material downgradient of the CCR Unit

Assumptions:

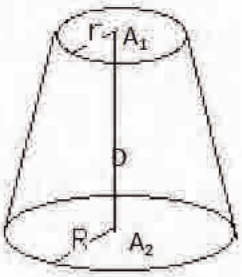
The volume is estimated by the volume with boron concentrations greater than 4 mg/L.
Plume areas are calculated based on the 4 mg/L contours displayed on Figure 6 and Figure 7.

Shallow plume area	21.75 acre		
	9.474E+05 ft^2	(A1)	
Deep plume area	87.40 acre		
	3.807E+06 ft^2	(A2)	
Saturated depth	32 feet	(D)	(Golder 2017)
Assumed effective porosity	0.3	(n)	(Golder 2017)

The plume area were approximated as circles, and the volume of impacted material was estimated as a frustrum using the following formula:

$Volume = \pi*D/3*(R^2 + Rr + r^2) = V_2$

$r = (A_1/\pi)^{1/2}$, $R = (A_2/\pi)^{1/2}$



r 549.2 ft

R 1101 ft

V_2 7.10E+07 ft^3

V_2 1629 acre-ft

Estimated volume of impacted groundwater was calculated using the following forumula:

$Volume = V_2*n = V_{water}$

V_{water} 2.13E+07 ft^3

V_{water} 1.59E+08 gallons

Prepared by: DFS
Checked by: BPC
Reviewed by: JBG

Golder Associates. Groundwater Monitoring Program Implementation Manual, October 2017
Wood, 2019. Multi-Cell Unit Surface Impoundments (CCR Final Rule) Draft Closure Application. March 8, 2019.

APPENDIX B

Slug Test Data and Calculations

Appendix B
HYDRAULIC CONDUCTIVITY TESTING RESULTS

Well	Date	Screened Interval	Type	Test Duration	Test Number	Hvorslev Method		Bouwer and Rice Method		van der Kamp Method		Hvorslev/Bouwer and Rice Arithmetic Mean	
						cm/sec	ft/day	cm/sec	ft/day	cm/sec	ft/day	cm/sec	ft/day
GAMW03	7/7/2016	5-15	Transducer (Rising)	<2 min	1	7.44E-03	2.11E+01	4.99E-03	1.42E+01	n/a	n/a	6.22E-03	1.77E+01
					2	7.45E-03	2.11E+01	5.22E-03	1.48E+01	n/a	n/a	6.34E-03	1.80E+01
GAMW13	7/7/2016	5-15	Transducer (Rising)	<2 min	1	5.75E-02	1.63E+02	3.91E-02	1.11E+02	n/a	n/a	4.83E-02	1.37E+02
					2	6.50E-02	1.84E+02	4.81E-02	1.36E+02	n/a	n/a	5.66E-02	1.60E+02
GAMW15	7/7/2016	5-15	Transducer (Rising)	<2 min	1	2.59E-02	7.34E+01	1.63E-02	4.63E+01	n/a	n/a	2.11E-02	5.99E+01
					2	1.11E-02	3.15E+01	1.08E-02	3.05E+01	n/a	n/a	1.10E-02	3.10E+01
GAMW19	7/7/2016	6-16	Transducer (Rising)	<2 min	1	3.70E-02	1.05E+02	2.25E-02	6.38E+01	n/a	n/a	2.98E-02	8.44E+01
					2	1.01E-01	2.87E+02	6.85E-02	1.94E+02	n/a	n/a	8.48E-02	2.41E+02
Average Shallow (515 ftbgs)						**3.90E-02**	**1.11E+02**	**2.69E-02**	**7.63E+01**	**n/a**	**n/a**	**3.30E-02**	**9.35E+01**
GAMW03B	7/6/2016	27-37	Transducer (Falling)	<2 min	1	6.78E-03	1.92E+01	5.81E-03	1.65E+01	n/a	n/a	6.30E-03	1.79E+01
					2	4.30E-03	1.22E+01	4.79E-03	1.36E+01	n/a	n/a	4.55E-03	1.29E+01
			Transducer (Rising)	<2 min	1	5.65E-03	1.60E+01	6.42E-03	1.82E+01	n/a	n/a	6.04E-03	1.71E+01
					2	1.47E-02	4.16E+01	1.25E-02	3.55E+01	1.49E-02	4.22E+01	1.36E-02	3.86E+01
GAMW13B	7/7/2016	25-35	Transducer (Falling)	<2 min	1	8.48E-03	2.40E+01	9.27E-03	2.63E+01	n/a	n/a	8.88E-03	2.52E+01
					2	8.09E-03	2.29E+01	9.27E-03	2.63E+01	n/a	n/a	8.68E-03	2.46E+01
			Transducer (Rising)	<2 min	1	1.11E-02	3.15E+01	1.16E-02	3.30E+01	2.73E-02	7.74E+01	1.14E-02	3.23E+01
					2	1.06E-02	3.00E+01	1.08E-02	3.06E+01	1.06E-02	3.01E+01	1.07E-02	3.03E+01
GAMW15B	7/7/2016	27.7-37.7	Transducer (Falling)	<2 min	1	4.50E-03	1.28E+01	3.45E-03	9.79E+00	n/a	n/a	3.98E-03	1.13E+01
					2	1.03E-02	2.91E+01	8.75E-03	2.48E+01	9.53E-03	2.70E+01	9.53E-03	2.70E+01
			Transducer (Rising)	<2 min	1	1.17E-02	3.32E+01	1.06E-02	3.02E+01	1.24E-02	3.50E+01	1.12E-02	3.17E+01
					2	1.06E-02	3.02E+01	9.79E-03	2.77E+01	1.69E-02	4.80E+01	1.02E-02	2.90E+01
GAMW19B	7/7/2016	23-33	Transducer (Falling)	<2 min	1	1.37E-02	3.88E+01	1.44E-02	4.09E+01	n/a	n/a	1.41E-02	3.99E+01
					2	6.82E-03	1.93E+01	6.31E-03	1.79E+01	n/a	n/a	6.57E-03	1.86E+01
			Transducer (Rising)	<2 min	1	1.84E-02	5.21E+01	1.83E-02	5.18E+01	1.29E-02	3.67E+01	1.84E-02	5.20E+01
					2	1.21E-02	3.43E+01	1.03E-02	2.91E+01	1.21E-02	3.43E+01	1.12E-02	3.17E+01
Average Deep (2535 ftbgs)						**9.86E-03**	**2.80E+01**	**9.52E-03**	**2.70E+01**	**1.46E-02**	**4.13E+01**	**9.69E-03**	**2.75E+01**

Notes:
ft/day = feet per day
cm/sec = centimeters per second
n/a = not analyzed

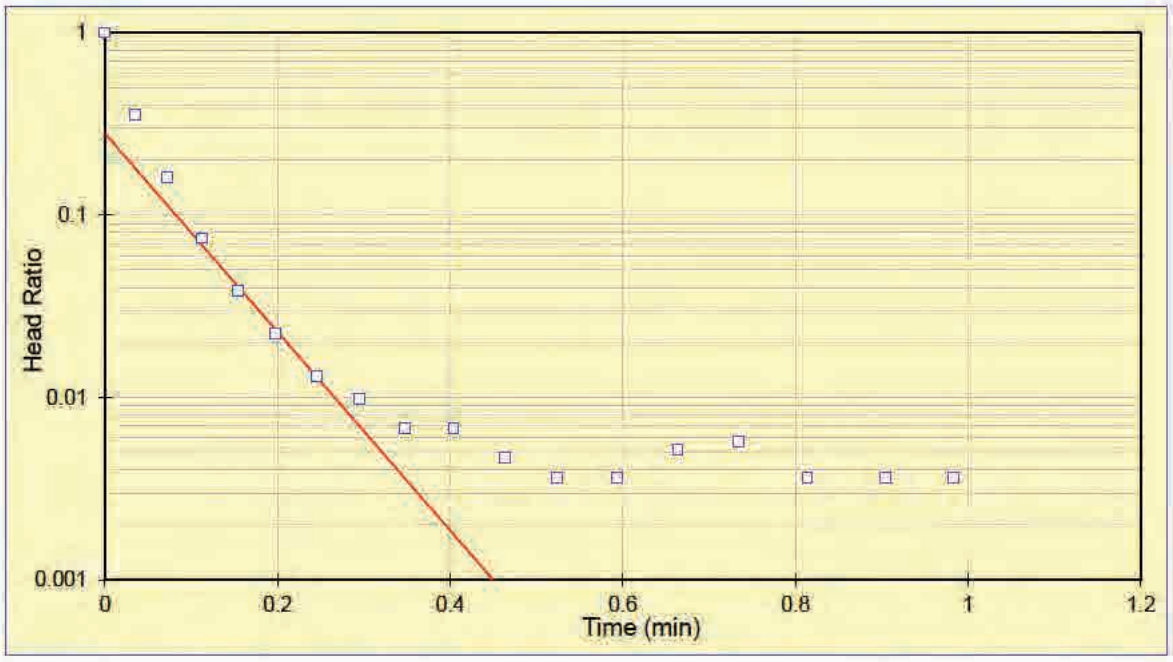
Prepared by: DFS
Checked by: KMC
Reviewed by: MAH

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	7.44E-03	cm/sec
t_1 =	0	K=	2.11E+01	ft/day
t_2 =	0.45			
h_1/h_0 =	0.28			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/25/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

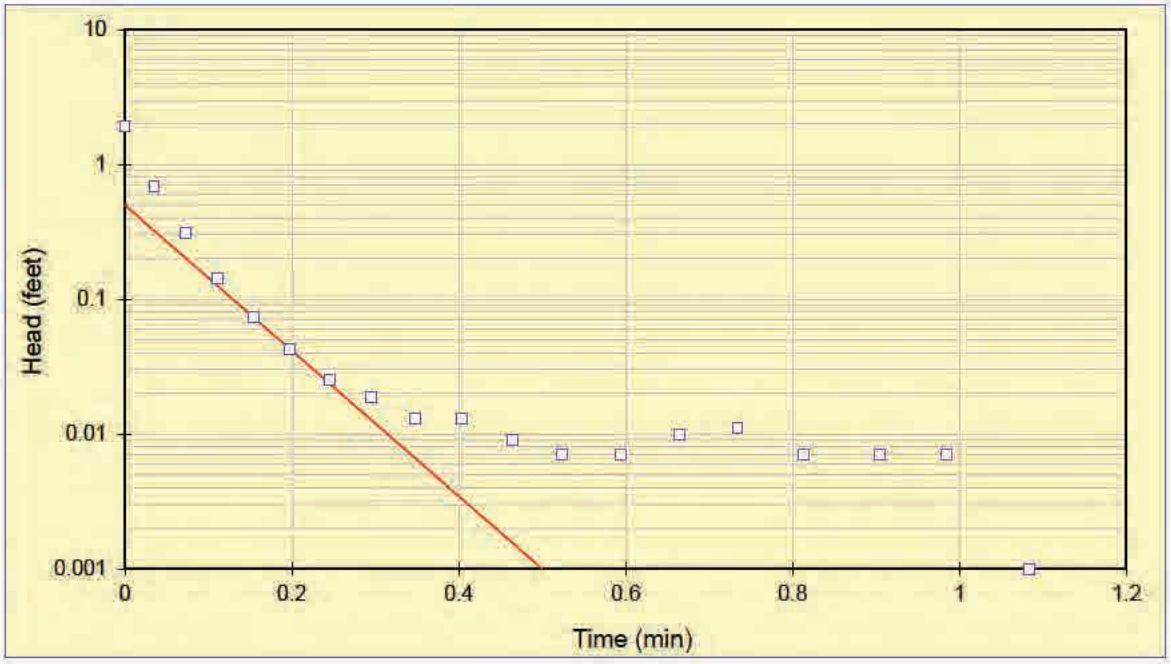
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.28
y_0 =	0.50
y_t =	0.001
t =	0.5

RESULTS

K=	4.99E-03	cm/sec
K=	1.42E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

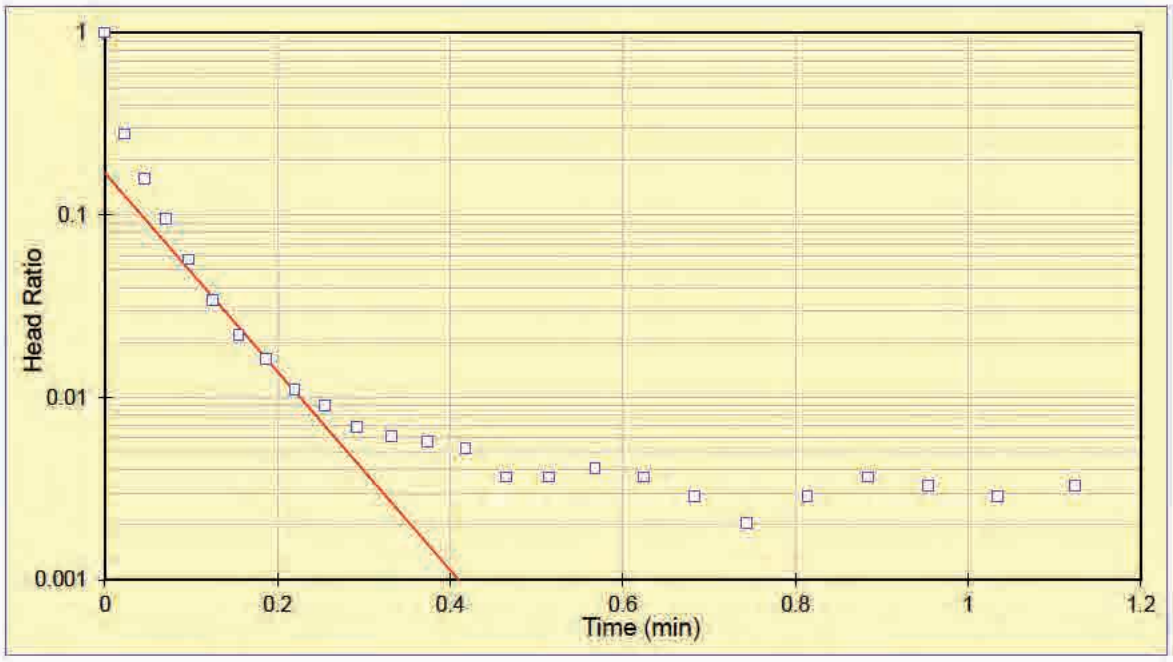
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	7.45E-03	cm/sec
t_1 =	0	K=	2.11E+01	ft/day
t_2 =	0.41			
h_1/h_0 =	0.17			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

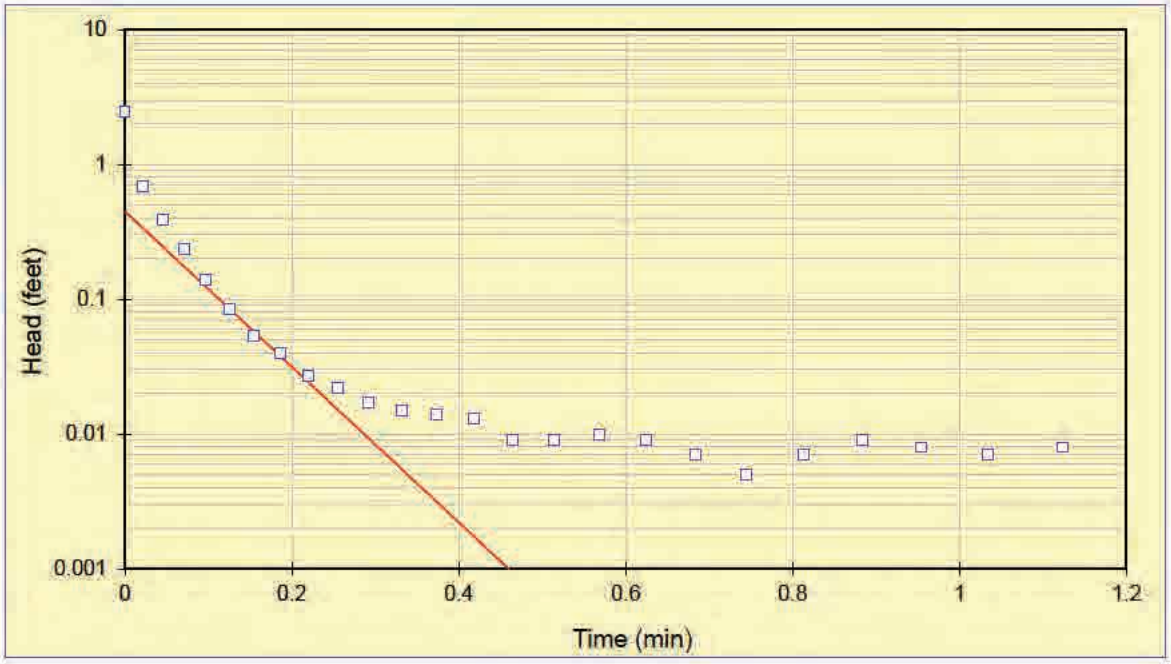
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.23
y_0 =	0.45
y_t =	0.001
t =	0.5

RESULTS

K=	5.22E-03	cm/sec
K=	1.48E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

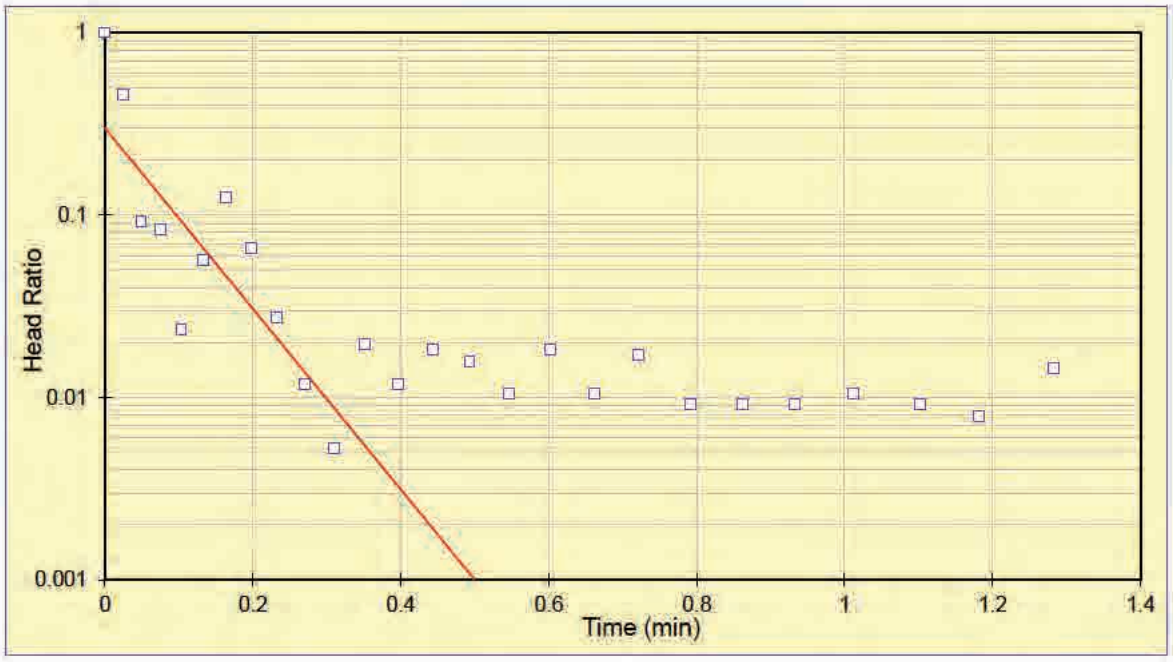
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-03B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	6.78E-03	cm/sec
t_1 =	0	K=	1.92E+01	ft/day
t_2 =	0.5			
h_1/h_0 =	0.30			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-03B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

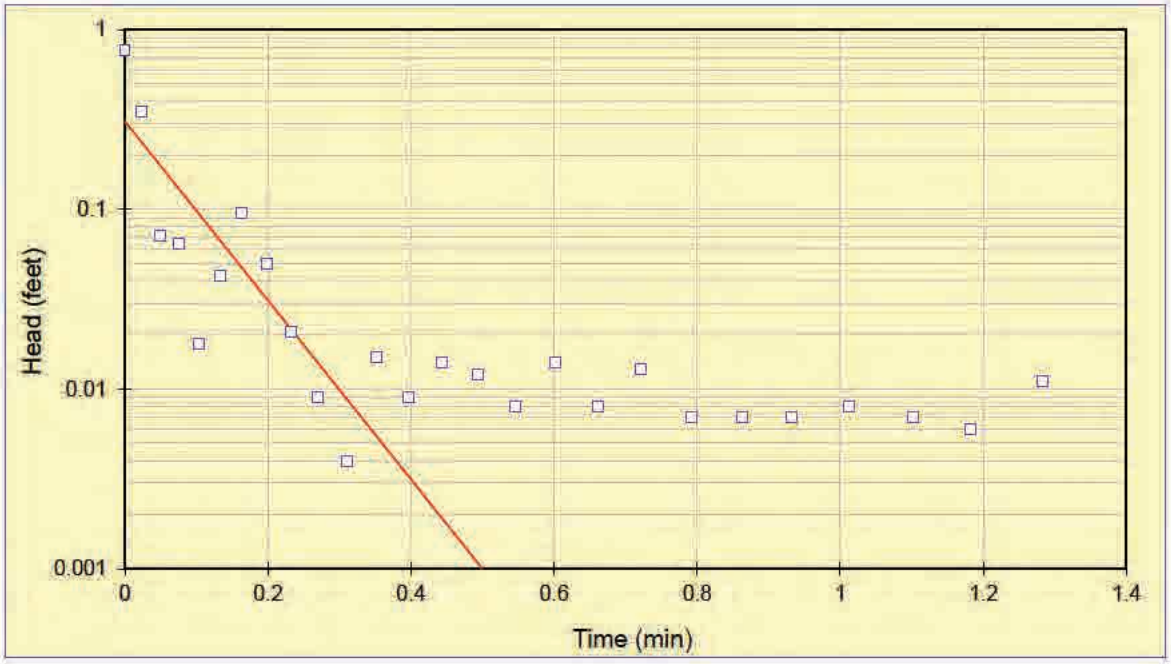
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.87
y_0 =	0.31
y_t =	0.001
t =	0.5

RESULTS

K=	5.81E-03	cm/sec
K=	1.65E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

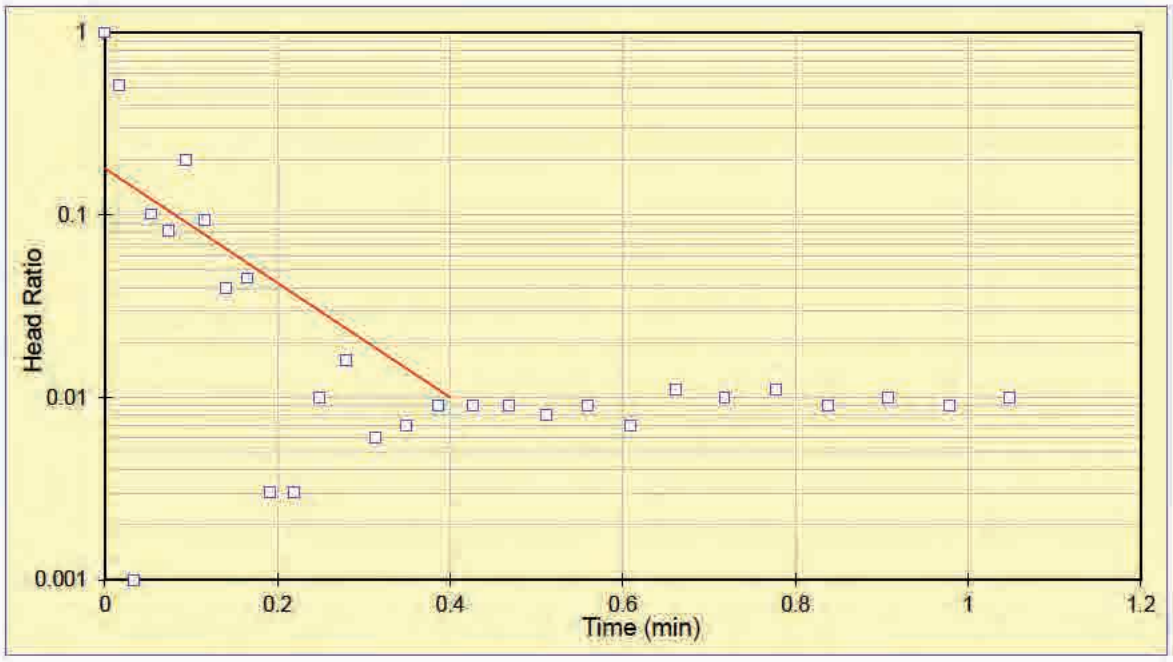
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-03B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	4.30E-03	cm/sec
t_1 =	0	K=	1.22E+01	ft/day
t_2 =	0.4			
h_1/h_0 =	0.18			
h_2/h_0 =	0.01			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-03B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

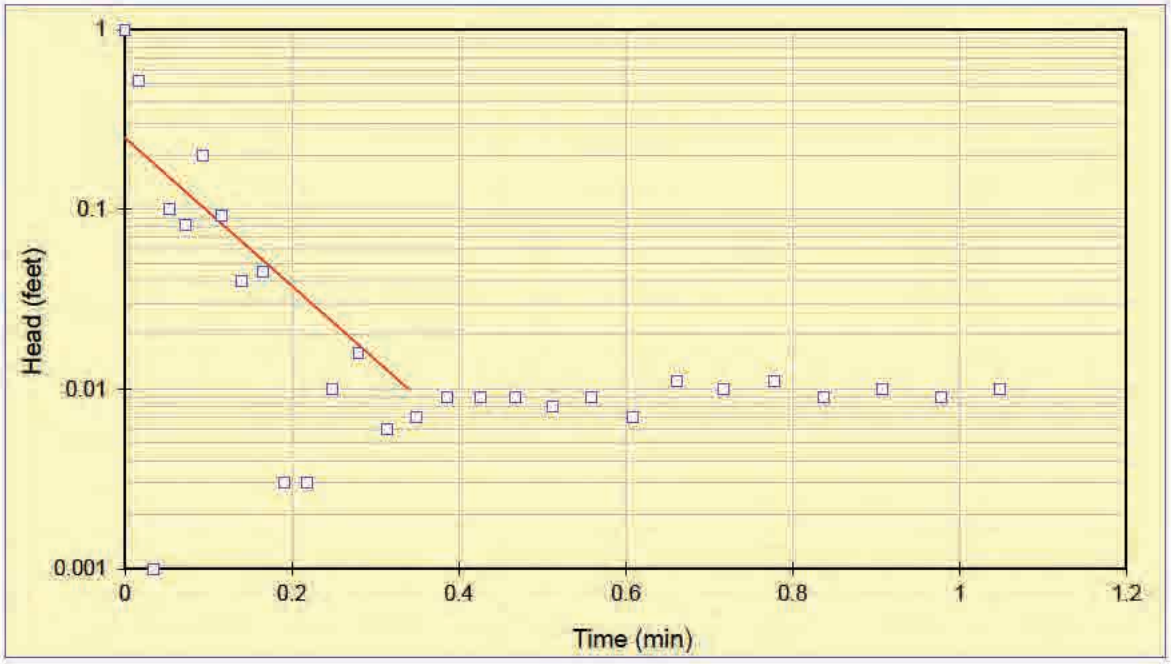
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.87
y_0 =	0.25
y_t =	0.010
t =	0.3

RESULTS

K=	4.79E-03	cm/sec
K=	1.36E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

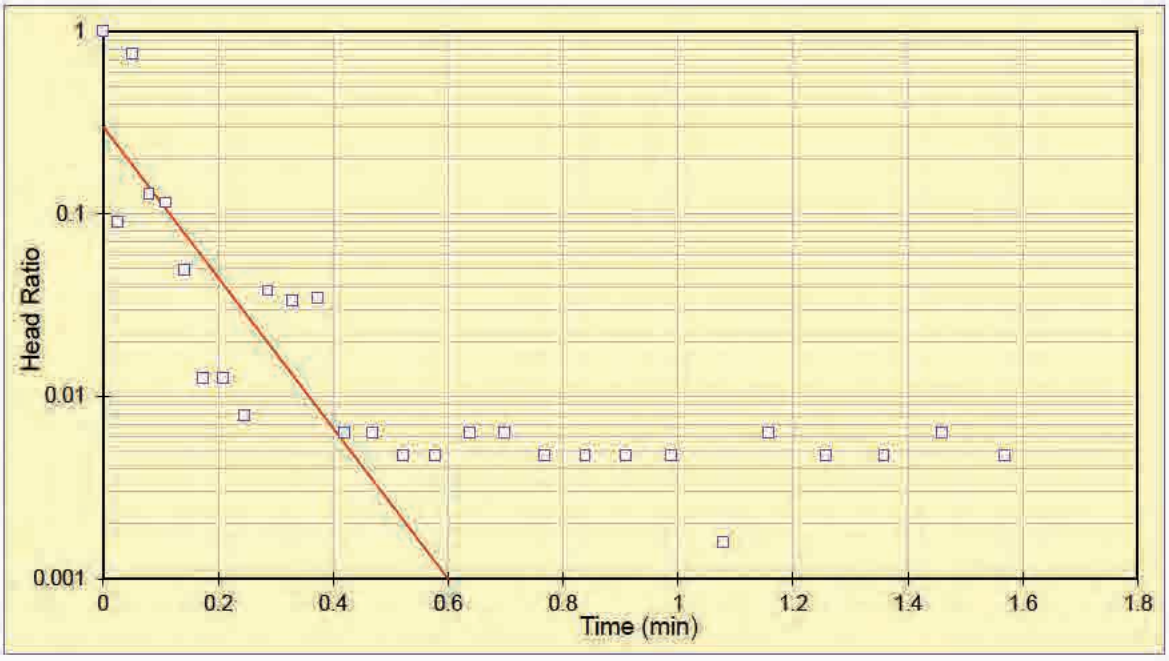
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	5.65E-03	cm/sec
t_1 =	0	K=	1.60E+01	ft/day
t_2 =	0.6			
h_1/h_0 =	0.30			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

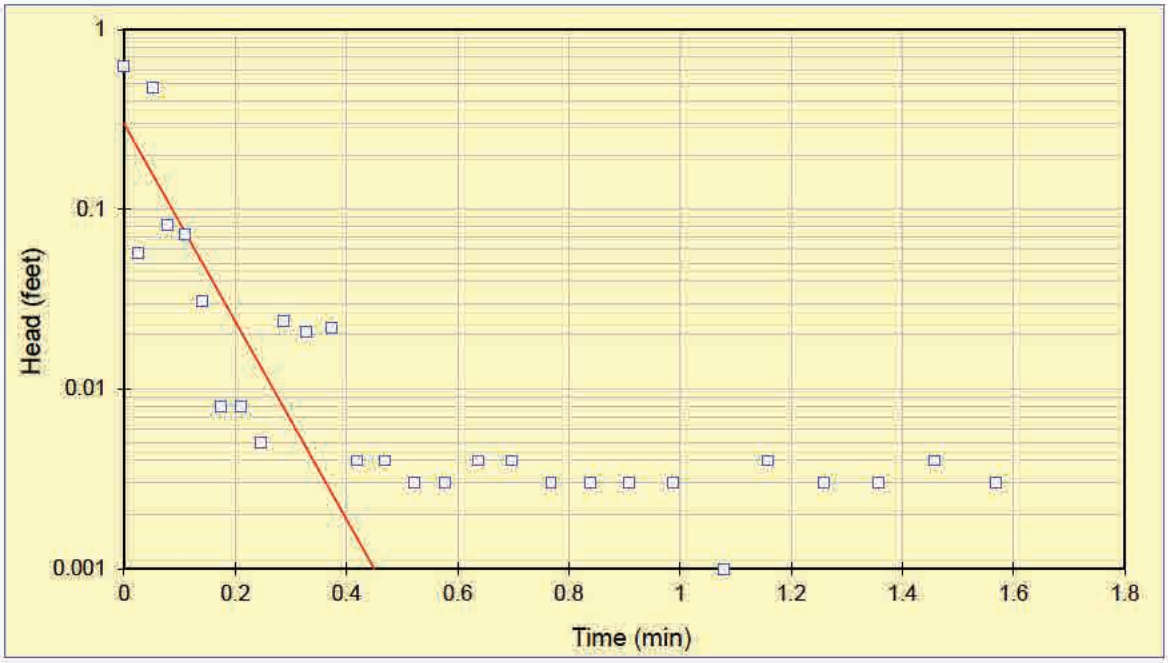
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.87
y_0 =	0.30
y_t =	0.001
t =	0.5

RESULTS

K=	6.42E-03	cm/sec
K=	1.82E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS

UNDERDAMPED SLUG TEST GAMW-03B (TEST 2)

$$T = b + a \ln T$$

where:

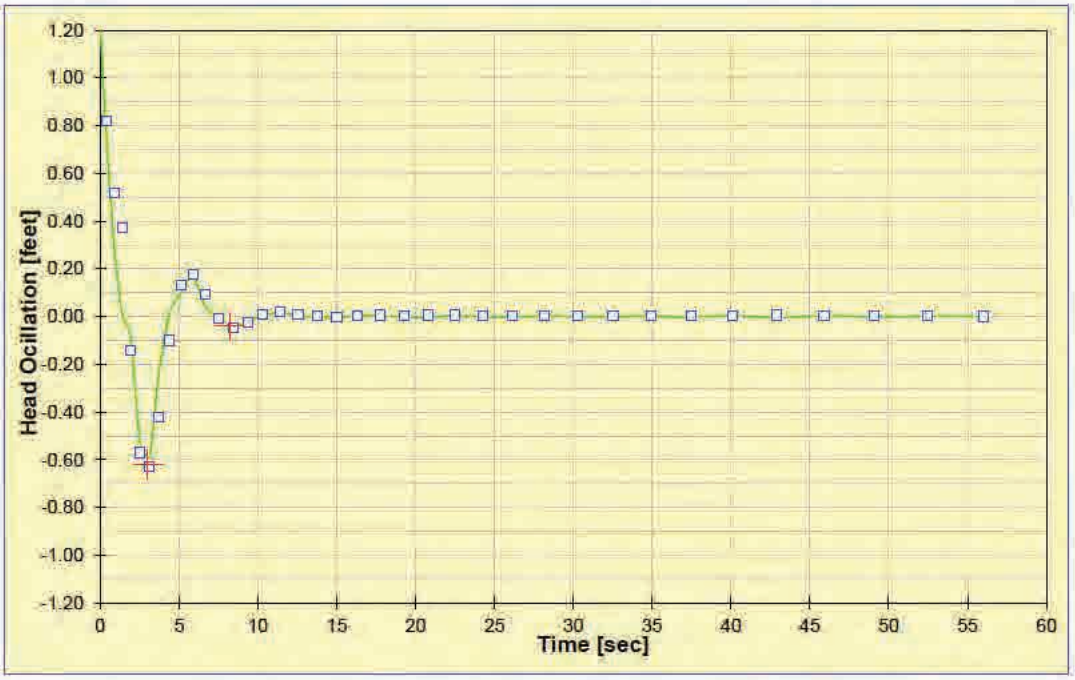
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma / (g/L)^{1/2}$$
$$L = g/(\omega^2 + \gamma^2)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.31826	ft^2
r_s =	0.08	ft	d =	0.3998	ft^{-1}
L_c =	19.62	ft	a =	0.00286	ft^3
L_s =	10.00	ft	t_1 =	3.00	sec
ω =	1.2083	ft^{-1}	t_2 =	8.20	sec
γ =	0.5271	ft^{-1}	$h(t_1)$ =	0.62	ft
L =	18.52	ft^3/sec^2	$h(t_2)$ =	0.04	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.73E-02 ft^2/sec	α < 0.1?	YES
T =	1.53E-02 ft^2/sec	d < 0.7?	YES
T =	1.32E+03 ft^2/day	L_1 =	18.52
K =	4.22E+01 ft/day	L_2 =	24.62
K =	1.49E-02 cm/sec	L_1:L_2 Diff <20% ?	NO



Project Name: NIPSCO RMSGS
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Test Date: 07/08/16

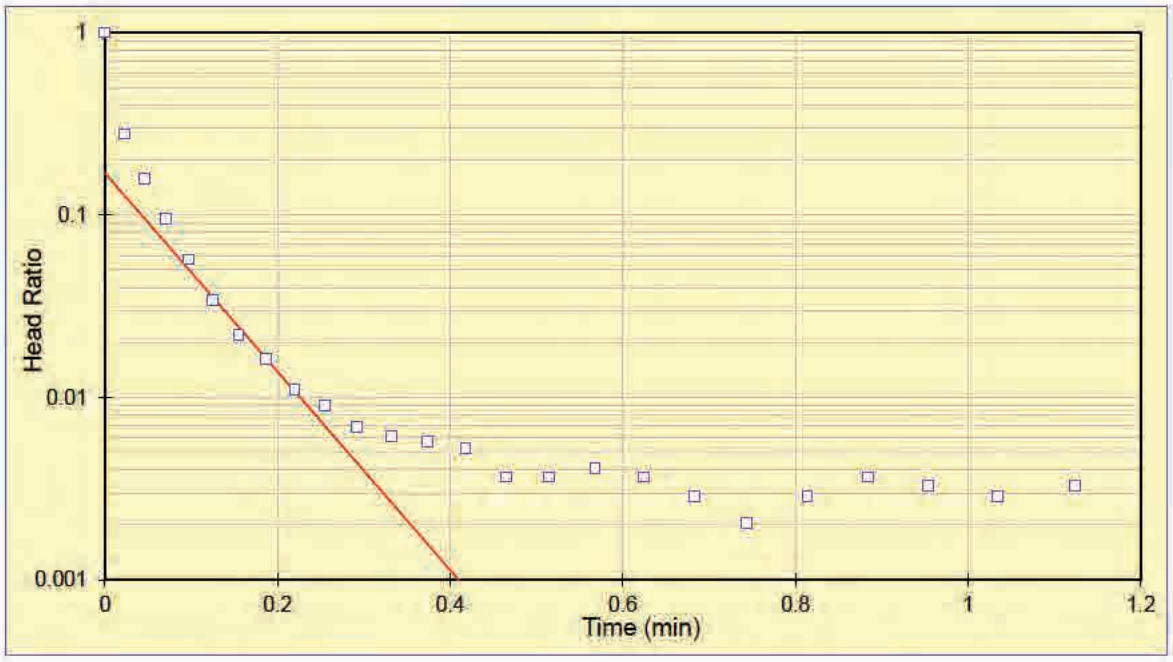
Analysis By: DFS
Checked By: JRS
Analysis Date: 8/8/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	7.45E-03	cm/sec
t_1 =	0	K=	2.11E+01	ft/day
t_2 =	0.41			
h_1/h_0 =	0.17			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-03 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

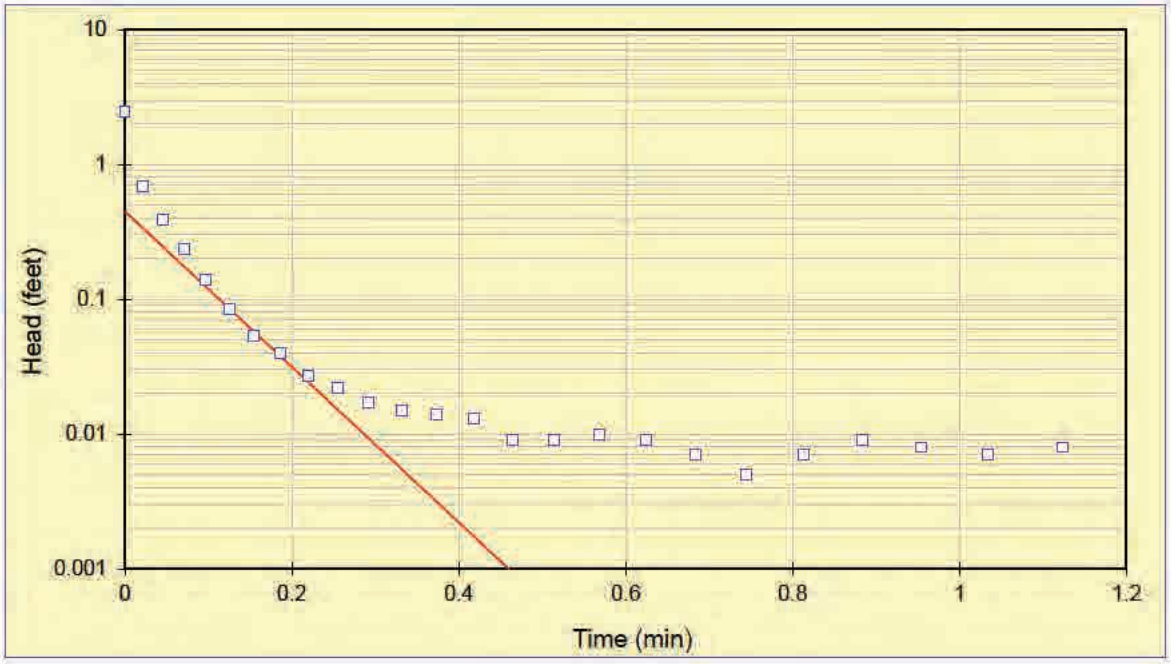
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.23
y_0 =	0.45
y_t =	0.001
t =	0.5

RESULTS

K=	5.22E-03	cm/sec
K=	1.48E+01	ft/day



Project Name: NIPSCO Schahfer
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Test Date: 07/07/16

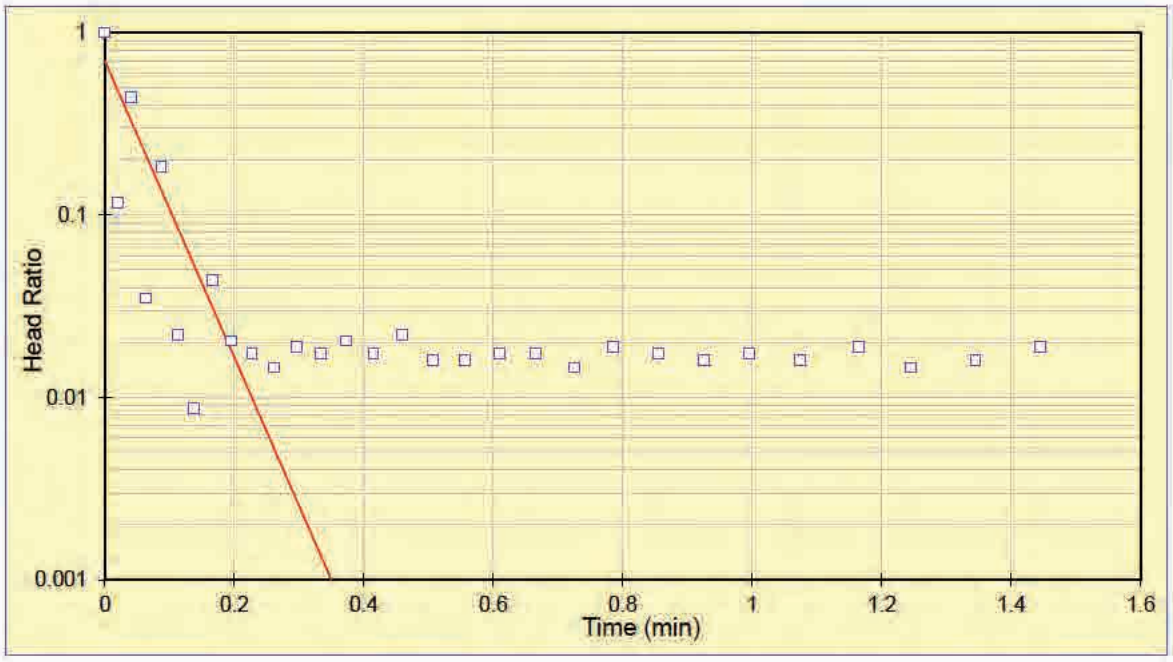
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.11E-02	cm/sec
t_1 =	0	K=	3.15E+01	ft/day
t_2 =	0.35			
h_1/h_0 =	0.70			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
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Analysis By: DFS
Checked By: JRS
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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

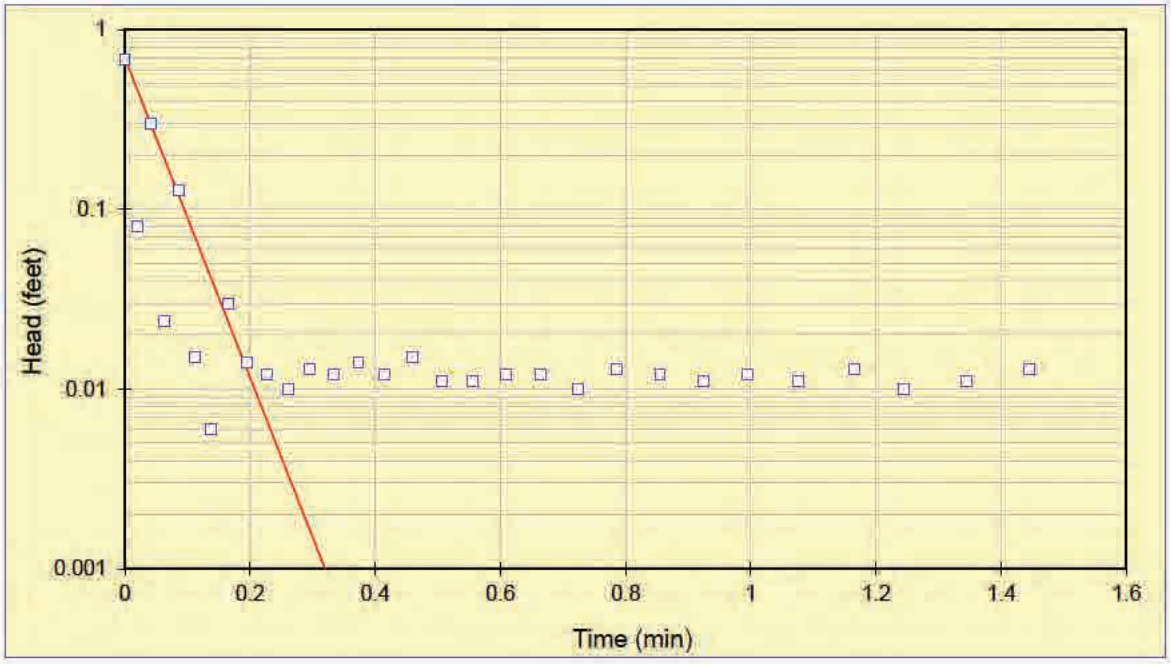
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.70
y_t =	0.001
t =	0.3

RESULTS

K=	1.16E-02	cm/sec
K=	3.30E+01	ft/day



Project Name: NIPSCO Schahfer
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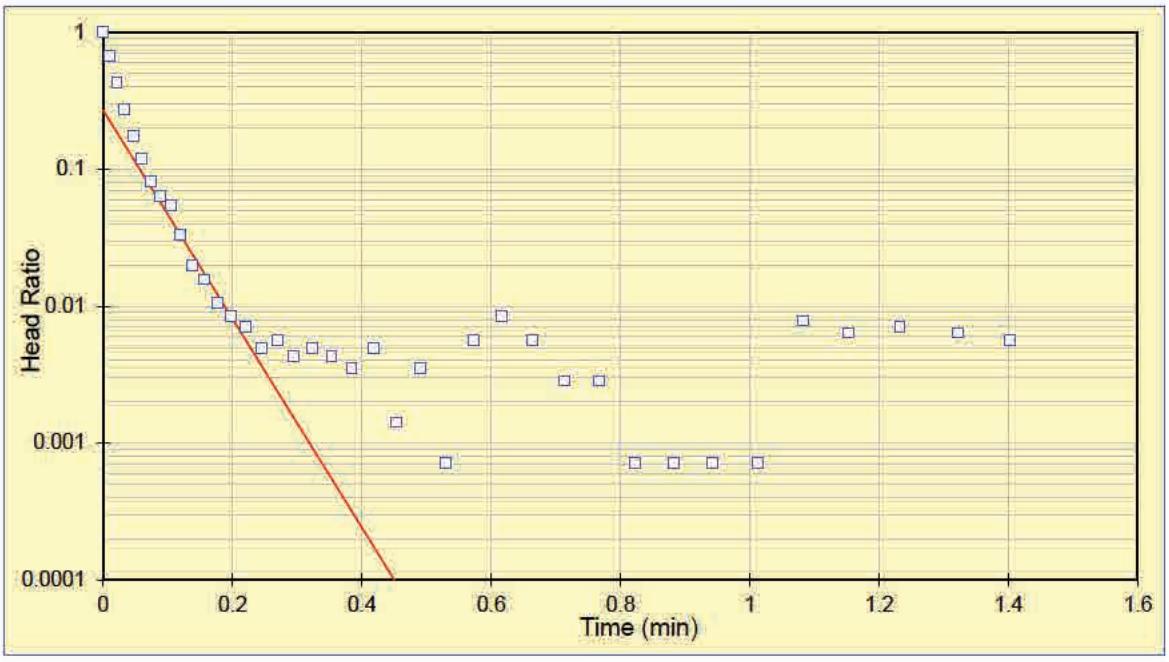
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.037	K=	6.50E-02	cm/sec
t_1 =	0	K=	1.84E+02	ft/day
t_2 =	0.45			
h_1/h_0 =	0.27			
h_2/h_0 =	0.00			



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Analysis By: DFS
Checked By: JRS
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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

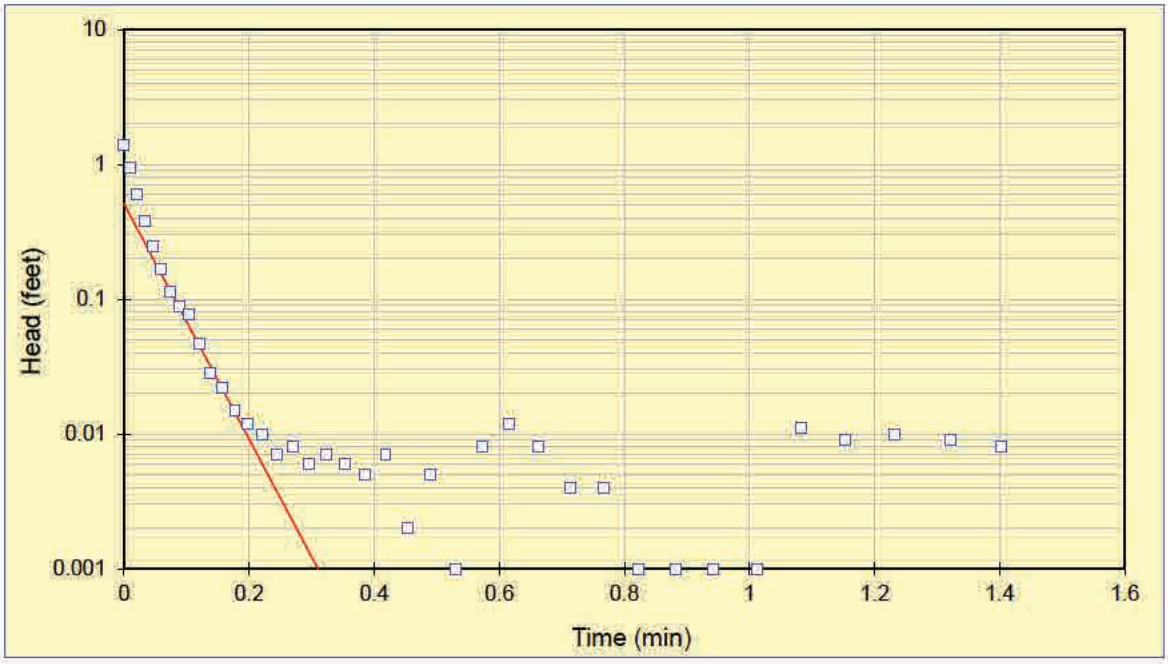
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.037
$\ln(R_e/r_w)$=	2.11
y_0 =	0.51
y_t =	0.001
t =	0.3

RESULTS

K=	4.81E-02	cm/sec
K=	1.36E+02	ft/day



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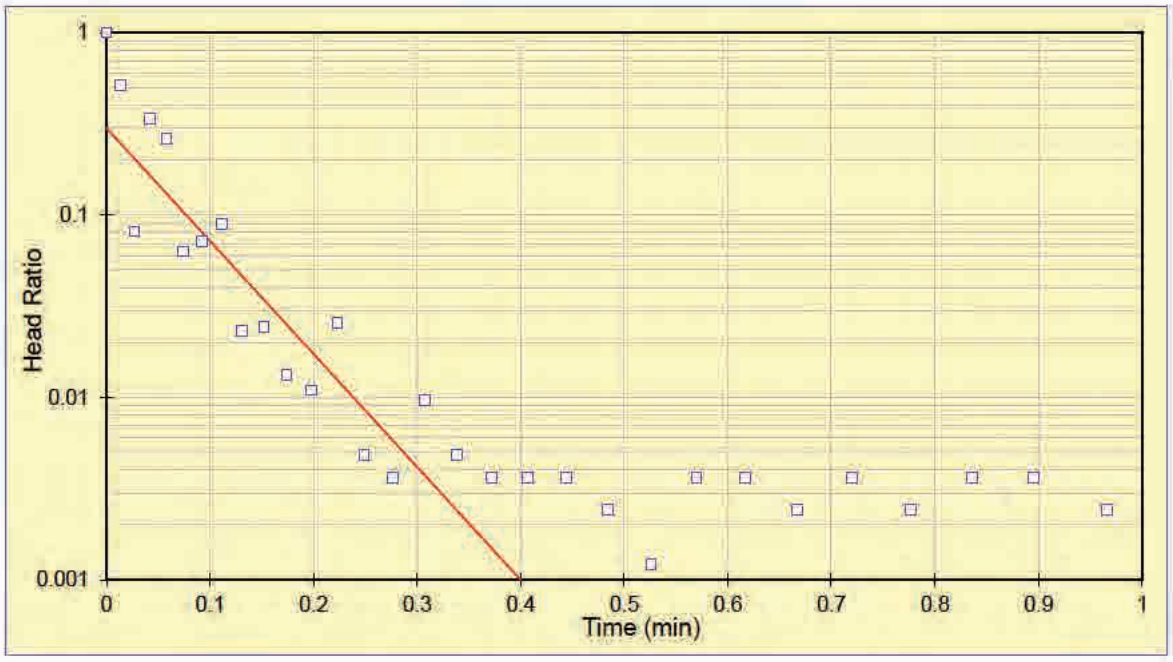
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	8.48E-03	cm/sec
t_1 =	0	K=	2.40E+01	ft/day
t_2 =	0.4			
h_1/h_0 =	0.30			
h_2/h_0 =	0.00			



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Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

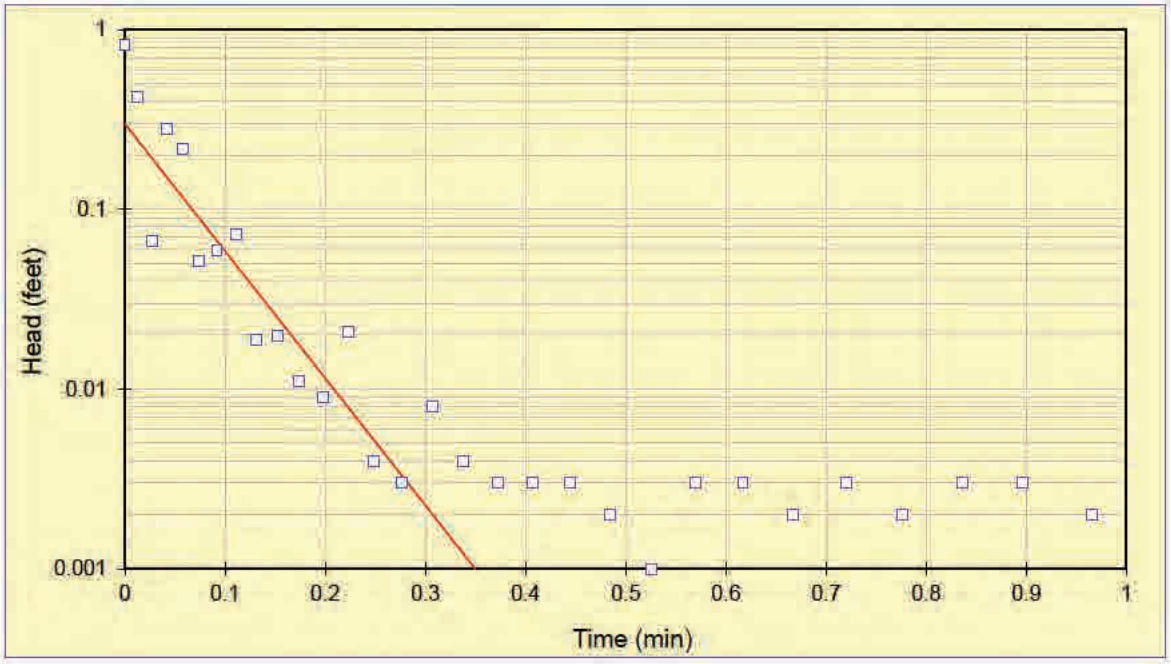
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.30
y_t =	0.001
t =	0.4

RESULTS

K=	9.27E-03	cm/sec
K=	2.63E+01	ft/day



Project Name: NIPSCO Schahfer
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Test Date: 07/07/16

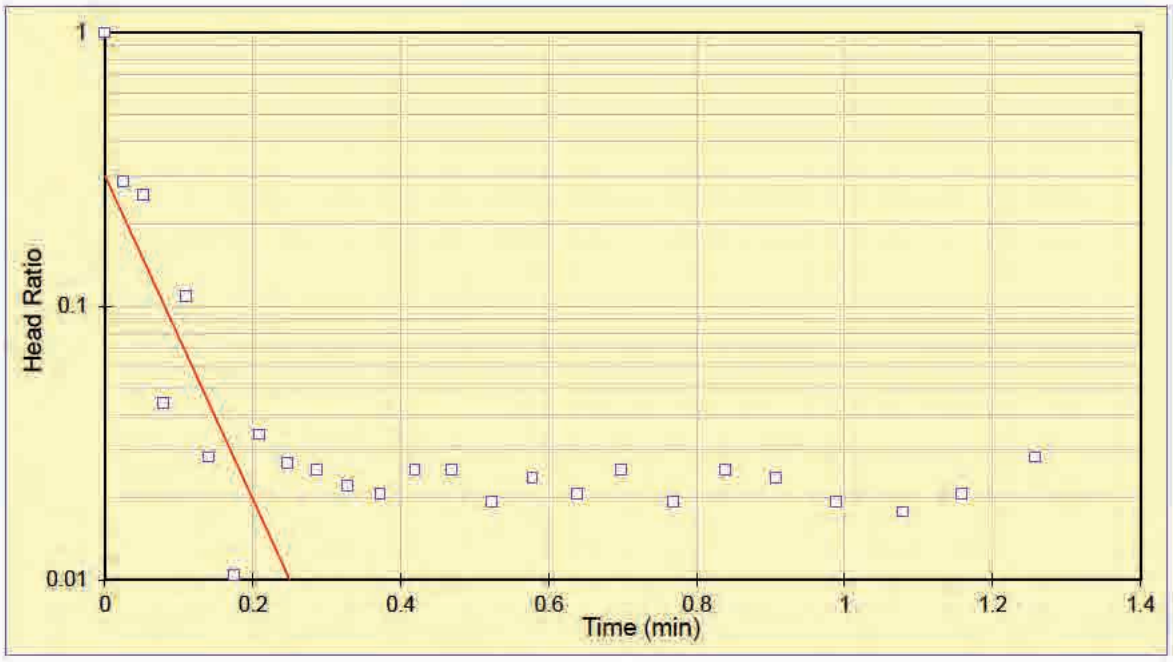
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-13B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	8.09E-03	cm/sec
t_1 =	0	K=	2.29E+01	ft/day
t_2 =	0.25			
h_1/h_0 =	0.30			
h_2/h_0 =	0.01			



Project Name: NIPSCO Schahfer
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BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-13B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

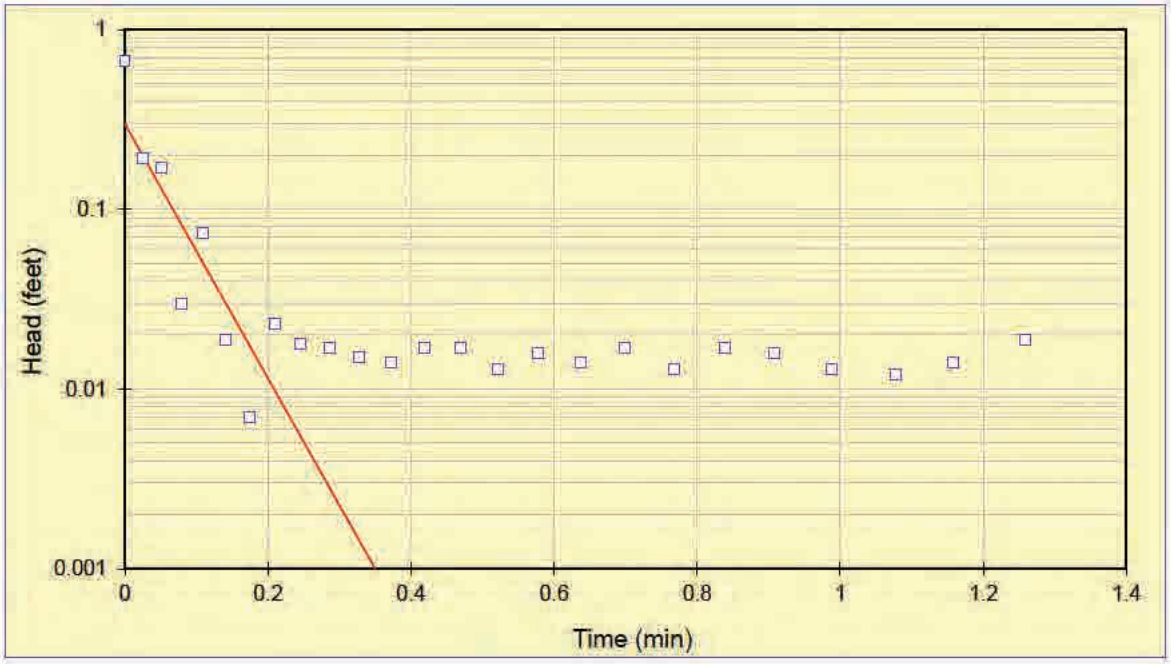
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.30
y_t =	0.001
t =	0.4

RESULTS

K=	9.27E-03	cm/sec
K=	2.63E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-13B (TEST 1)

$$T = b + a \ln T$$

where:

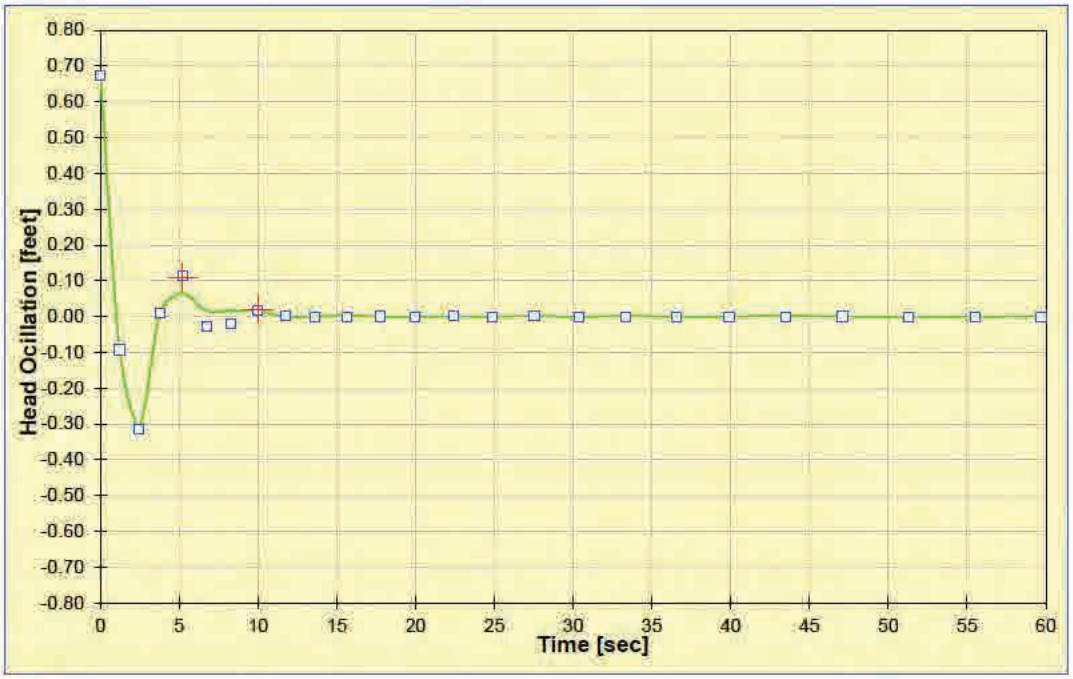
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma/(g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.35632	ft^2
r_s =	0.08	ft	d =	0.2619	ft^{-1}
L_c =	19.45	ft	a =	0.00450	ft^3
L_s =	9.98	ft	t_1 =	5.20	sec
w =	1.3090	ft^{-1}	t_2 =	10.00	sec
g =	0.3552	ft^{-1}	$h(t_1)$ =	0.11	ft
L =	17.50	ft^3/sec^2	$h(t_2)$ =	0.02	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	4.27E-02 ft^2/sec	a < 0.1?	YES
T =	2.64E-02 ft^2/sec	d < 0.7?	YES
T =	2.28E+03 ft^2/day	L_1 =	17.50
K =	7.74E+01 ft/day	L_2 =	24.44
K =	2.73E-02 cm/sec	L_1:L_2 Diff <20% ?	NO



Project Name: NIPSCO RMSGS
Project No.: 164-8171
Test Date: 07/07/16

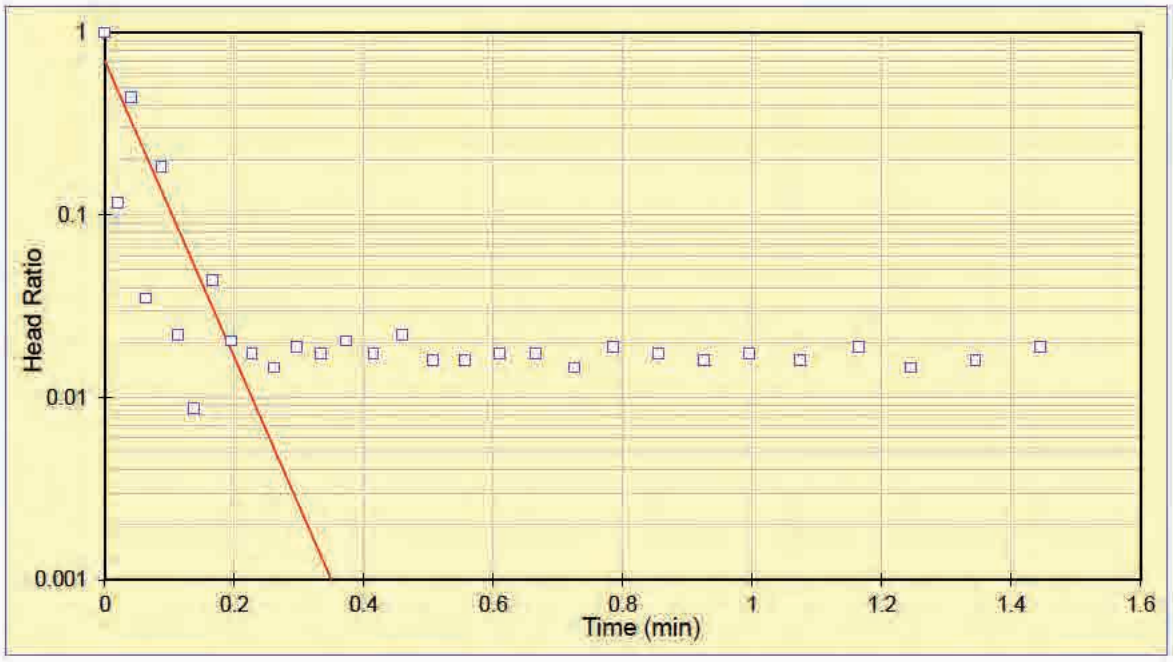
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.11E-02	cm/sec
t_1 =	0	K=	3.15E+01	ft/day
t_2 =	0.35			
h_1/h_0 =	0.70			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

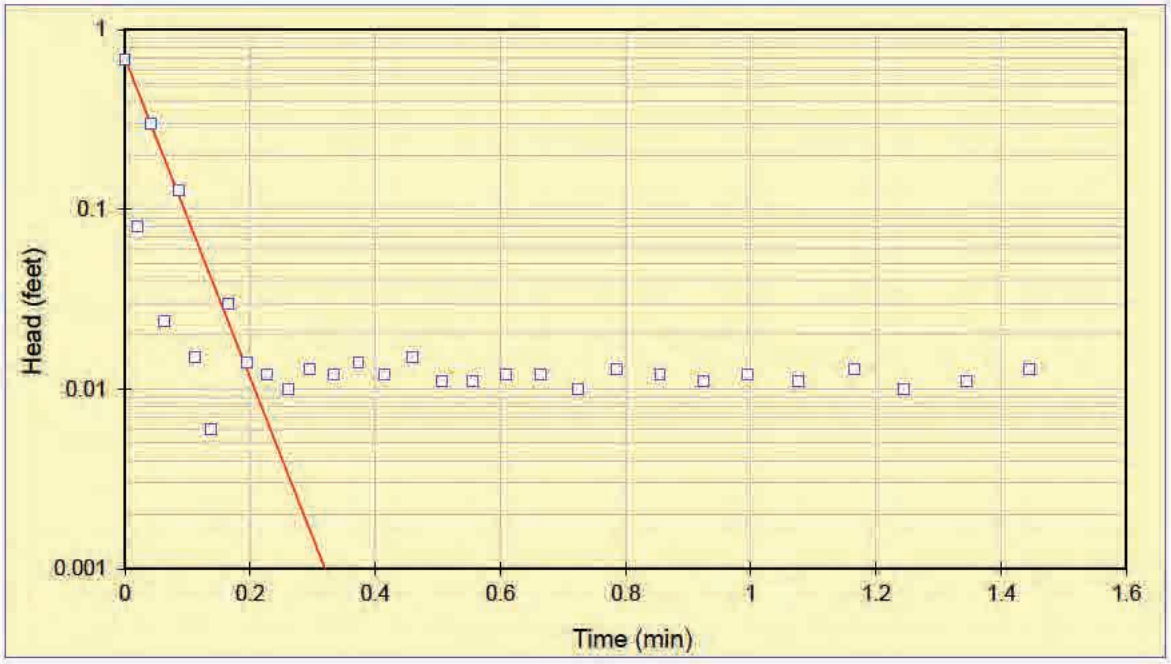
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.70
y_t =	0.001
t =	0.3

RESULTS

K=	1.16E-02	cm/sec
K=	3.30E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-13B (TEST 2)

$$T = b + a \ln T$$

where:

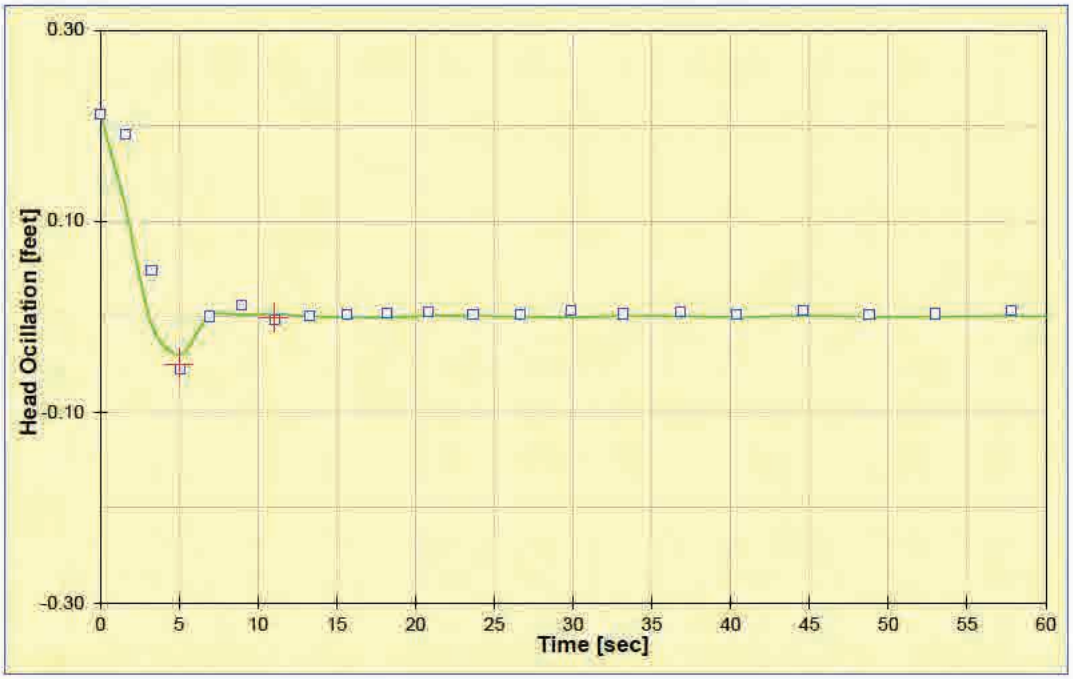
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma / (g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.23358	ft^2
r_s =	0.08	ft	d =	0.5285	ft^{-1}
L_c =	19.14	ft	a =	0.00203	ft^3
L_s =	9.98	ft	t_1 =	5.00	sec
w =	1.0472	ft^{-1}	t_2 =	11.00	sec
g =	0.6520	ft^{-1}	$h(t_1)$ =	0.05	ft
L =	21.15	ft^3/sec^2	$h(t_2)$ =	0.00	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	1.95E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.02E-02 ft^2/sec	$d < 0.7$?	YES
T =	8.77E+02 ft^2/day	L_1 =	21.15
K =	3.01E+01 ft/day	L_2 =	24.13
K =	1.06E-02 cm/sec	L_1:L_2 Diff <20% ?	YES



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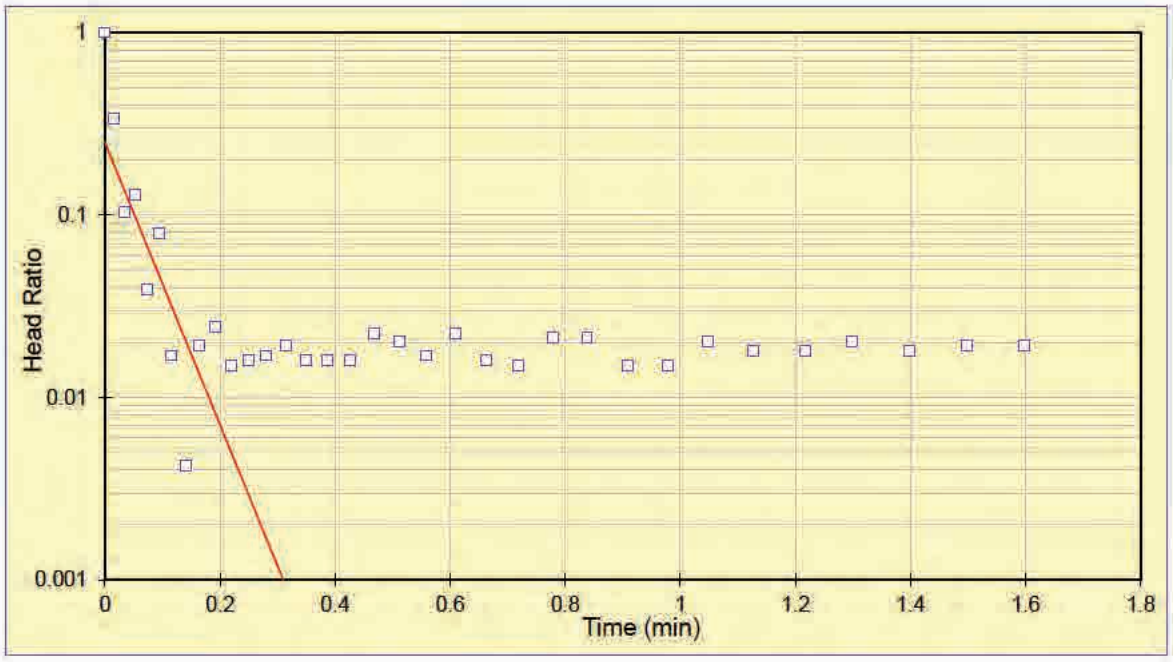
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.06E-02	cm/sec
t_1 =	0	K=	3.00E+01	ft/day
t_2 =	0.31			
h_1/h_0 =	0.25			
h_2/h_0 =	0.00			



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Checked By: JRS
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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-13B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

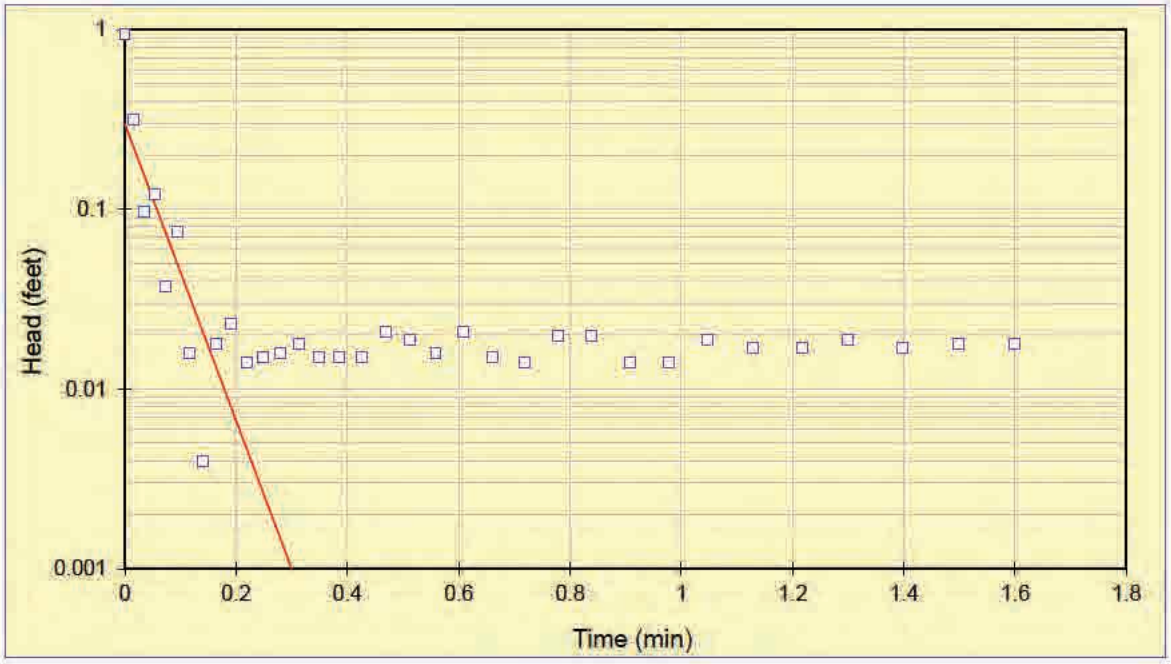
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.22
y_0 =	0.30
y_t =	0.001
t =	0.3

RESULTS

K=	1.08E-02	cm/sec
K=	3.06E+01	ft/day



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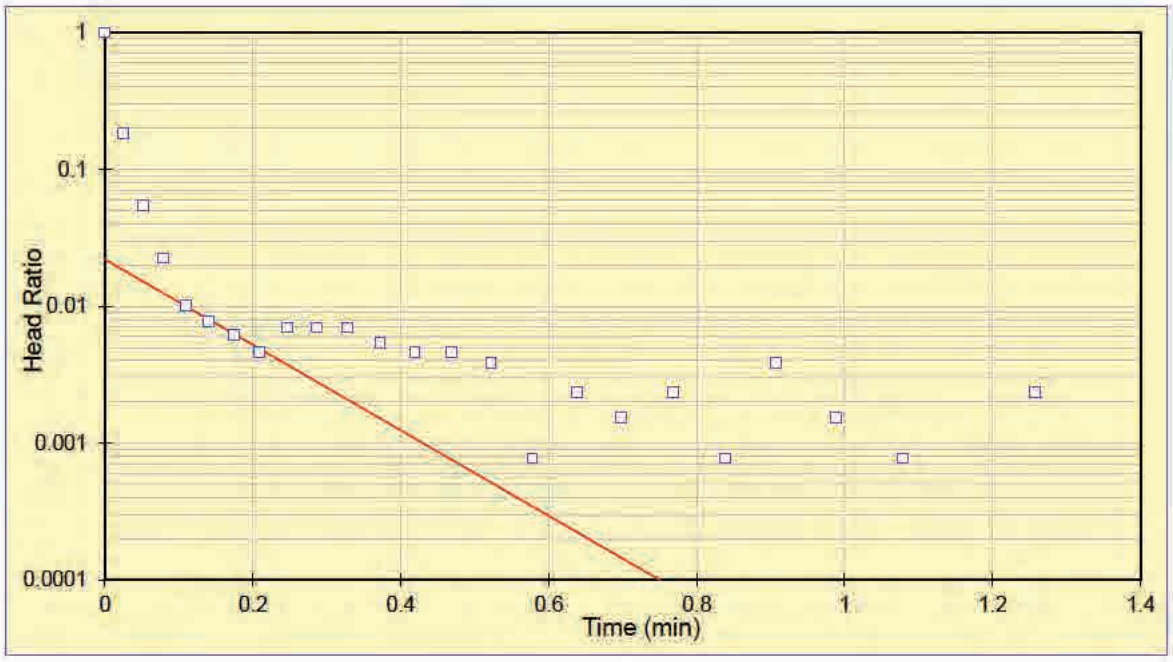
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15 (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.417	K=	2.59E-02	cm/sec
t_1 =	0	K=	7.34E+01	ft/day
t_2 =	0.75			
h_1/h_0 =	0.02			
h_2/h_0 =	0.00			



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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15 (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

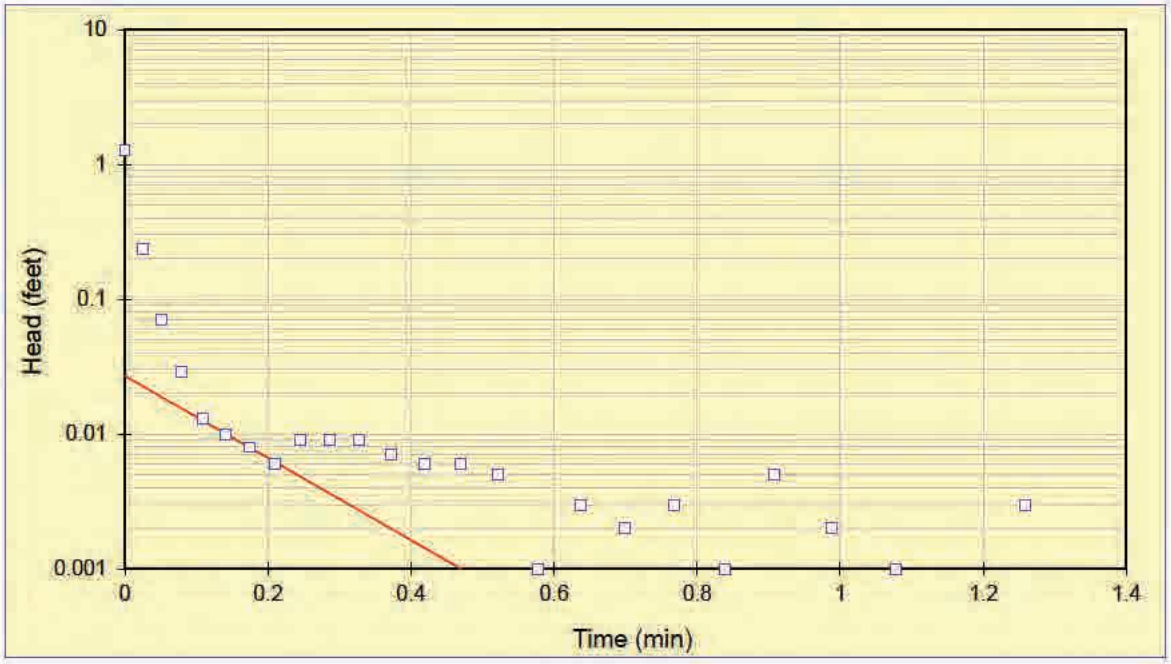
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.417
$\ln(R_e/r_w)$=	2.14
y_0 =	0.03
y_t =	0.001
t =	0.5

RESULTS

K=	1.63E-02	cm/sec
K=	4.63E+01	ft/day



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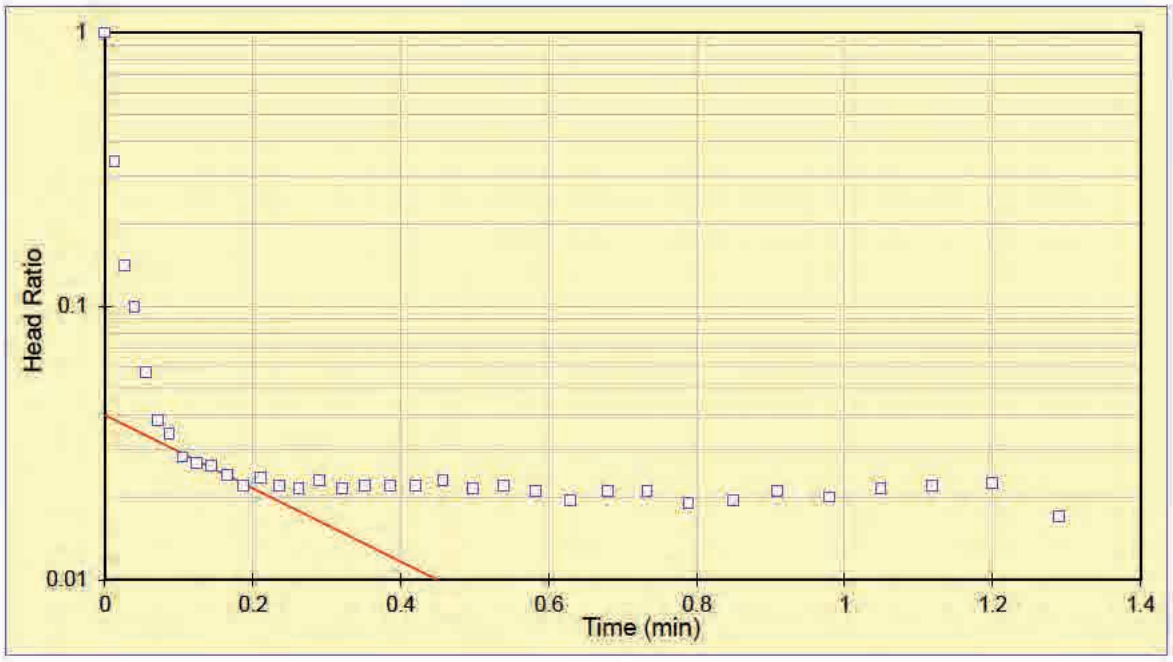
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.348	K=	1.11E-02	cm/sec
t_1 =	0	K=	3.16E+01	ft/day
t_2 =	0.45			
h_1/h_0 =	0.04			
h_2/h_0 =	0.01			



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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

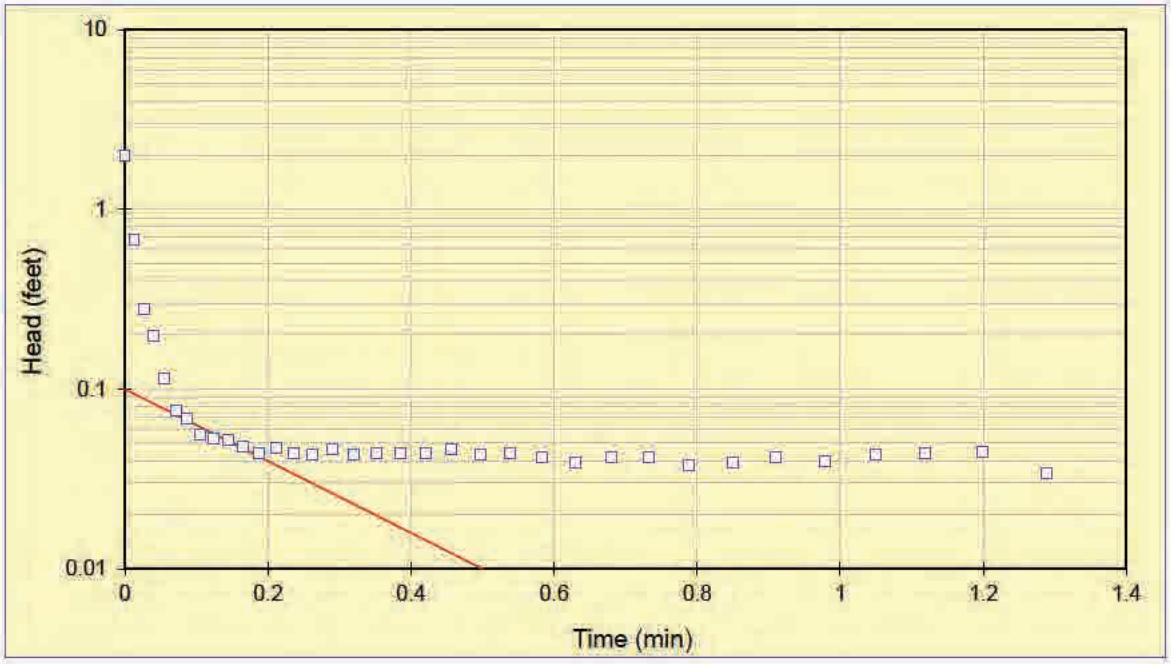
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.348
$\ln(R_e/r_w)$=	2.13
y_0 =	0.10
y_t =	0.010
t =	0.5

RESULTS

K=	1.08E-02	cm/sec
K=	3.05E+01	ft/day



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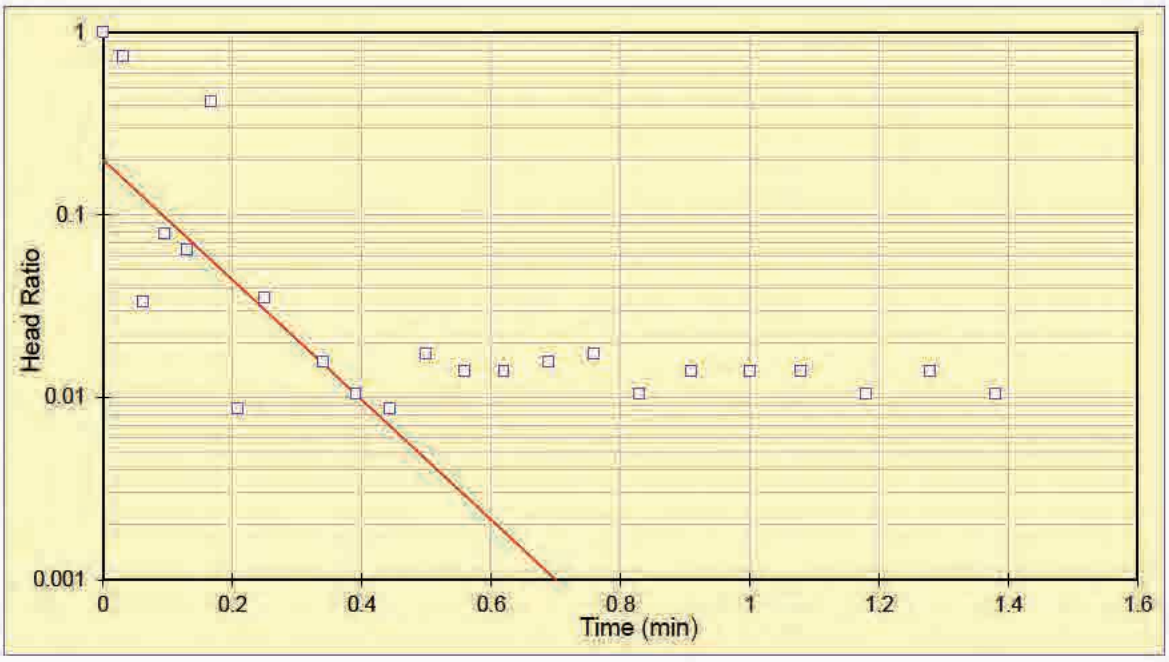
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-15B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	4.50E-03	cm/sec
t_1 =	0	K=	1.28E+01	ft/day
t_2 =	0.7			
h_1/h_0 =	0.20			
h_2/h_0 =	0.00			



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BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-15B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

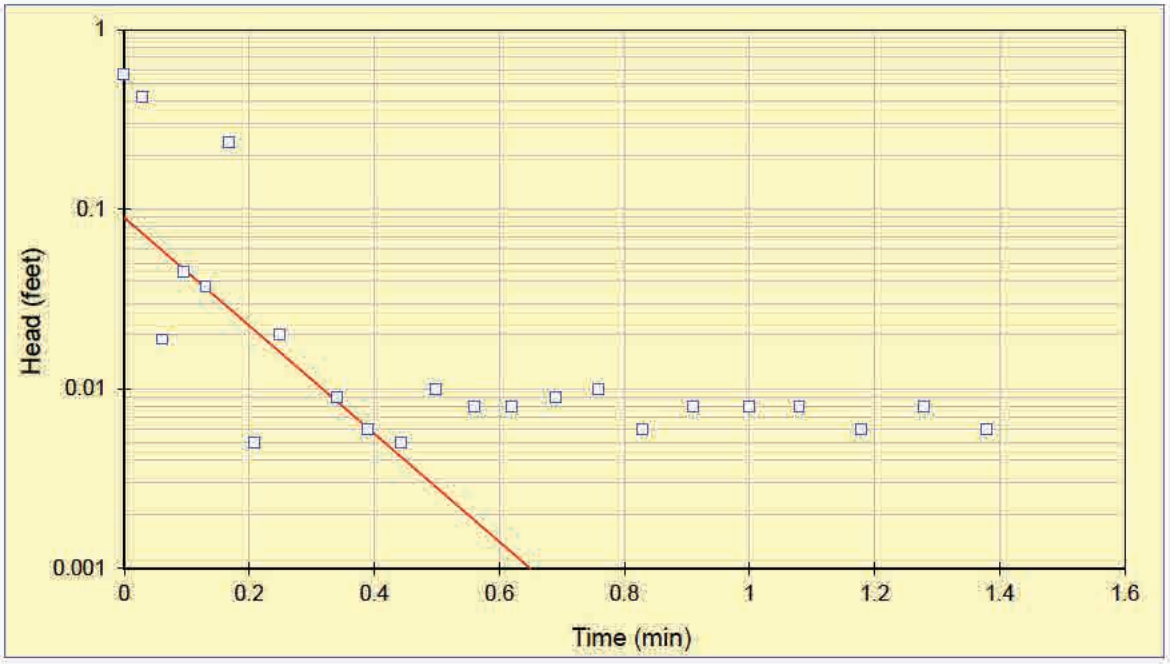
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.83
y_0 =	0.09
y_t =	0.001
t =	0.7

RESULTS

K=	3.45E-03	cm/sec
K=	9.79E+00	ft/day



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van der KAMP FALLING HEAD SLUG TEST ANALYSIS

UNDERDAMPED SLUG TEST GAMW-15B (TEST 2)

$$T = b + a \ln T$$

where:

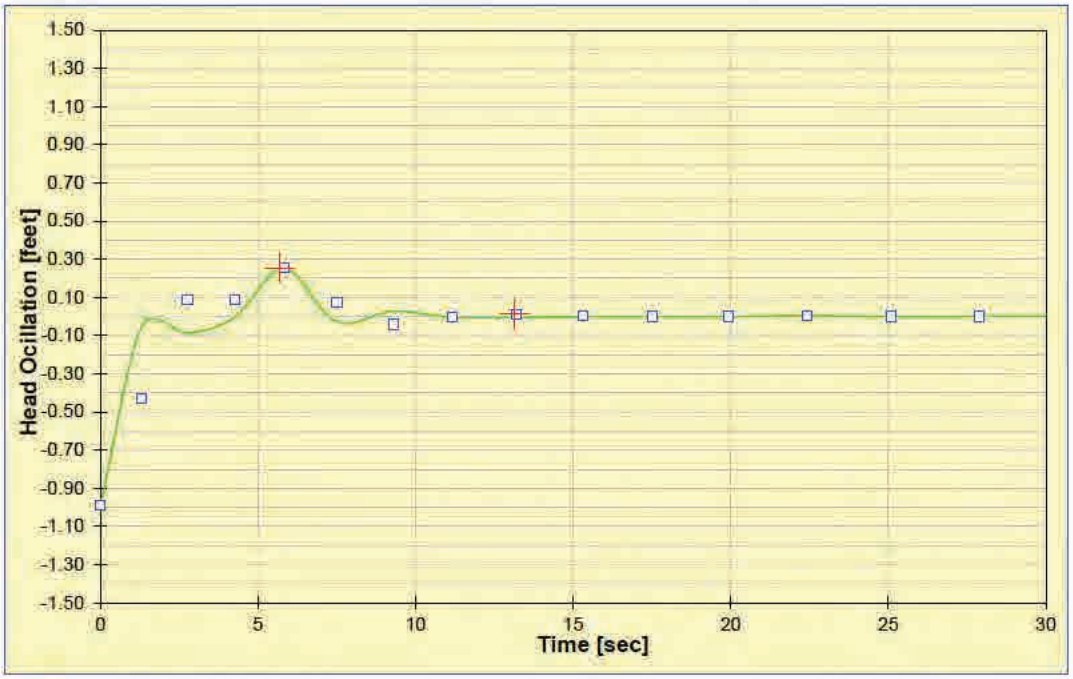
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma/(g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	0.93787	ft^2
r_s =	0.08	ft	d =	0.4374	ft^{-1}
L_c =	19.23	ft	a =	0.00186	ft^3
L_s =	10.00	ft	t_1 =	5.70	sec
w =	0.8434	ft^{-1}	t_2 =	13.15	sec
g =	0.4102	ft^{-1}	$h(t_1)$ =	0.26	ft
L =	36.60	ft^3/sec^2	$h(t_2)$ =	0.01	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	1.84E-02 ft^2/sec	$a < 0.1$?	YES
T =	9.76E-03 ft^2/sec	$d < 0.7$?	YES
T =	8.44E+02 ft^2/day	L_1 =	36.60
K =	2.70E+01 ft/day	L_2 =	24.23
K =	9.53E-03 cm/sec	L_1:L_2 Diff <20% ?	NO



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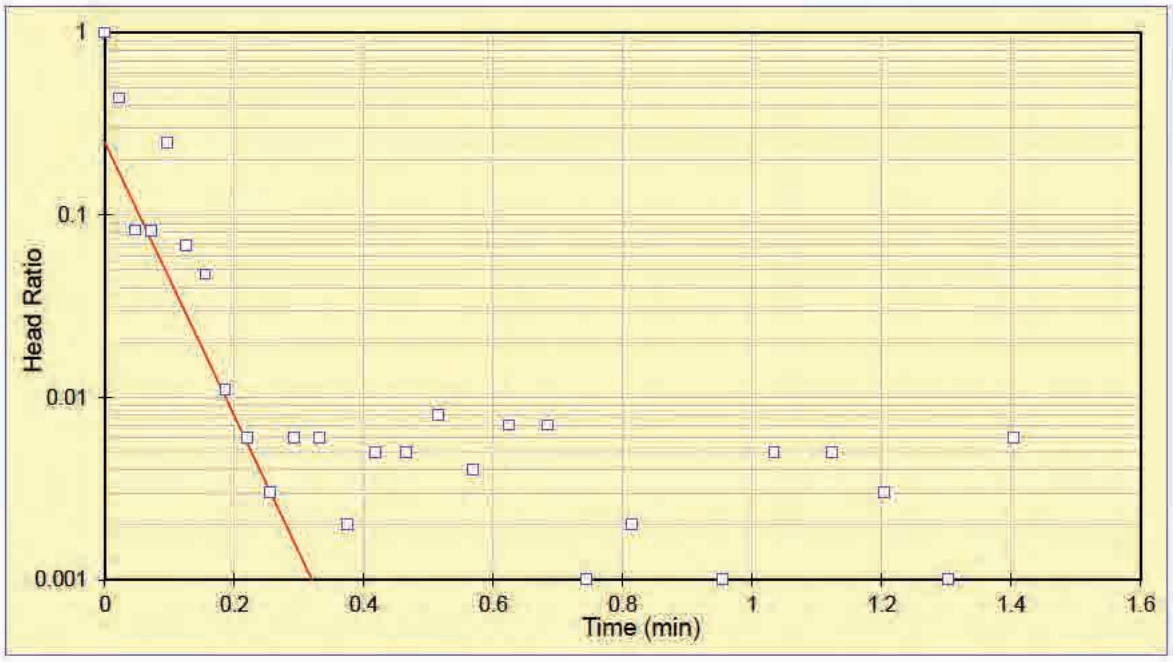
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-15B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.03E-02	cm/sec
t_1 =	0	K=	2.91E+01	ft/day
t_2 =	0.32			
h_1/h_0 =	0.25			
h_2/h_0 =	0.00			



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BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-15B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

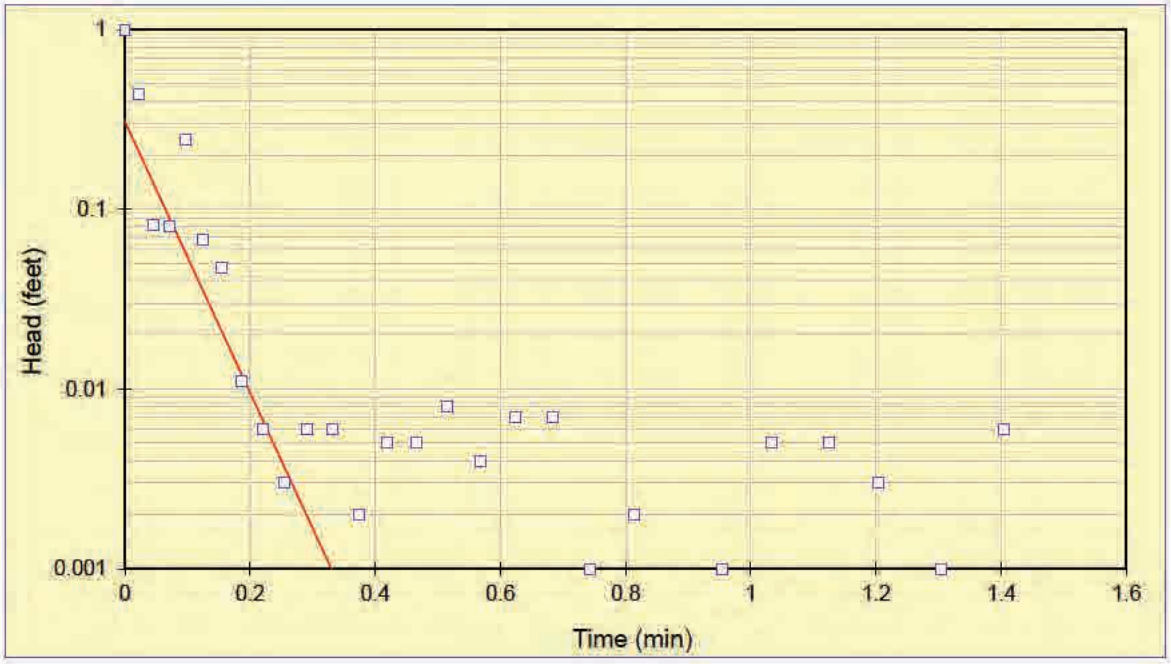
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.85
y_0 =	0.31
y_t =	0.001
t =	0.3

RESULTS

K=	8.75E-03	cm/sec
K=	2.48E+01	ft/day



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van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-15B (TEST 1)

$$T = b + a \ln T$$

where:

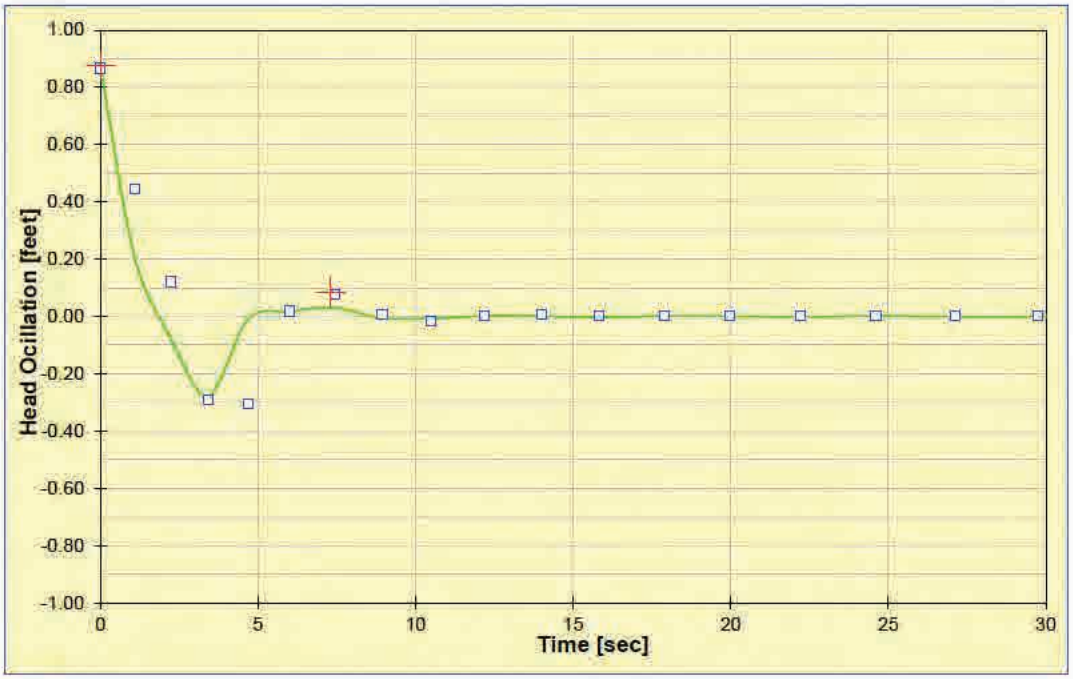
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma / (g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	0.91806	ft^2
r_s =	0.08	ft	d =	0.3479	ft^{-1}
L_c =	19.23	ft	a =	0.00229	ft^3
L_s =	10.00	ft	t_1 =	0.00	sec
w =	0.8607	ft^{-1}	t_2 =	7.30	sec
g =	0.3194	ft^{-1}	$h(t_1)$ =	0.88	ft
L =	38.19	ft^3/sec^2	$h(t_2)$ =	0.09	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.27E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.27E-02 ft^2/sec	$d < 0.7$?	YES
T =	1.09E+03 ft^2/day	L_1 =	38.19
K =	3.50E+01 ft/day	L_2 =	24.23
K =	1.24E-02 cm/sec	L_1:L_2 Diff <20% ?	NO



Project Name: NIPSCO RMSGS
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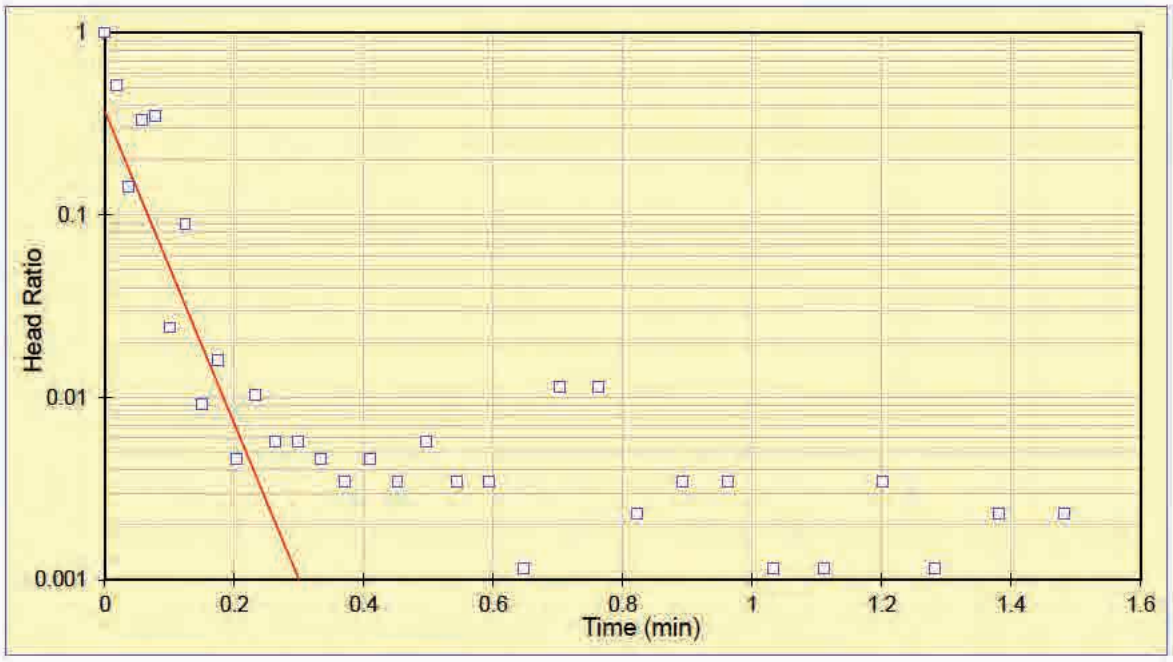
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.17E-02	cm/sec
t_1 =	0	K=	3.32E+01	ft/day
t_2 =	0.3			
h_1/h_0 =	0.37			
h_2/h_0 =	0.00			



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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

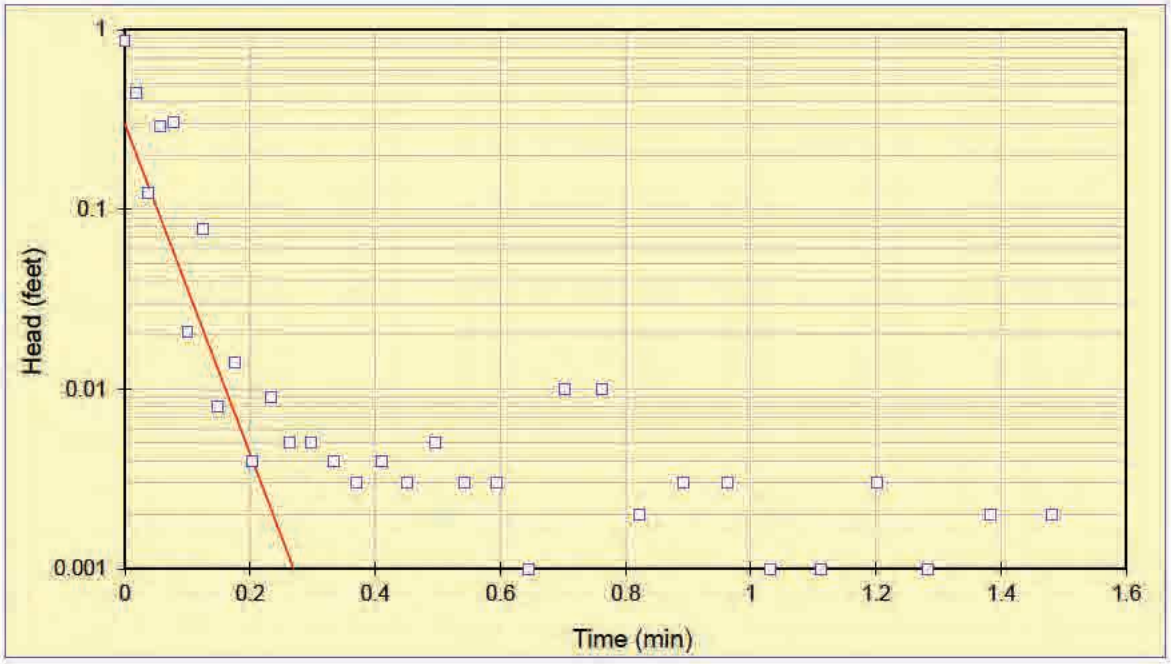
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.85
y_0 =	0.30
y_t =	0.001
t =	0.3

RESULTS

K=	1.06E-02	cm/sec
K=	3.02E+01	ft/day



Project Name: NIPSCO Schahfer
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Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-15B (TEST 2)

$$T = b + a \ln T$$

where:

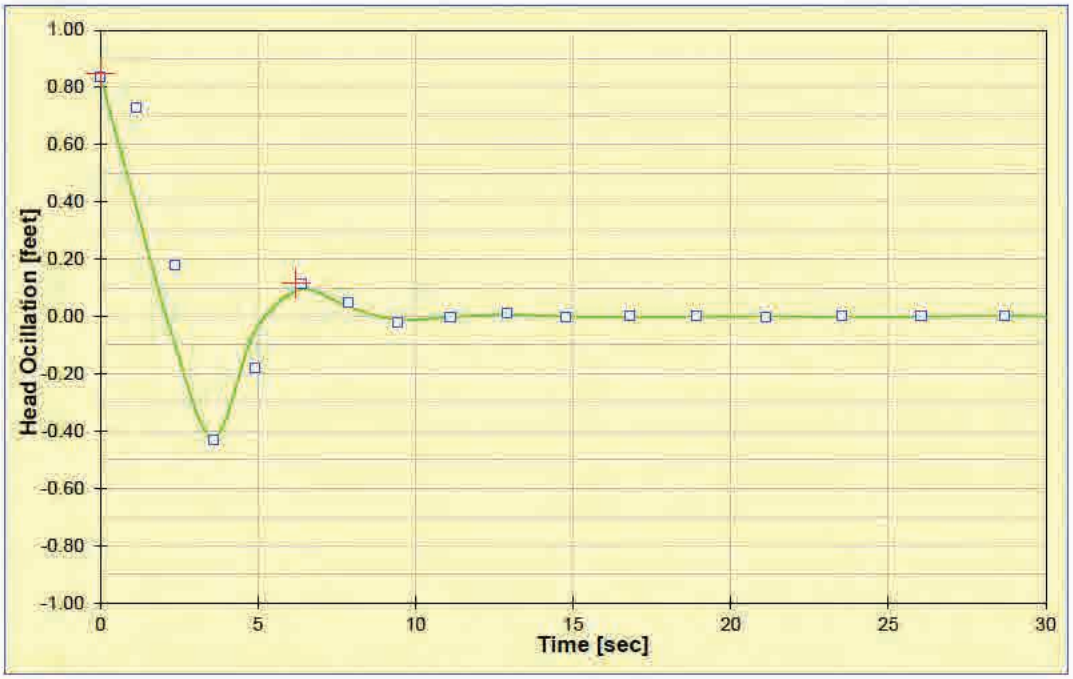
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma/(g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.06353	ft^2
r_s =	0.08	ft	d =	0.3034	ft^{-1}
L_c =	19.22	ft	a =	0.00304	ft^3
L_s =	10.00	ft	t_1 =	0.00	sec
w =	1.0134	ft^{-1}	t_2 =	6.20	sec
g =	0.3226	ft^{-1}	$h(t_1)$ =	0.85	ft
L =	28.46	ft^3/sec^2	$h(t_2)$ =	0.12	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.97E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.73E-02 ft^2/sec	$d < 0.7$?	YES
T =	1.50E+03 ft^2/day	L_1 =	28.46
K =	4.80E+01 ft/day	L_2 =	24.22
K =	1.69E-02 cm/sec	L_1:L_2 Diff <20% ?	YES



Project Name: NIPSCO RMSGS
Project No.: 164-8171
Test Date: 07/07/16

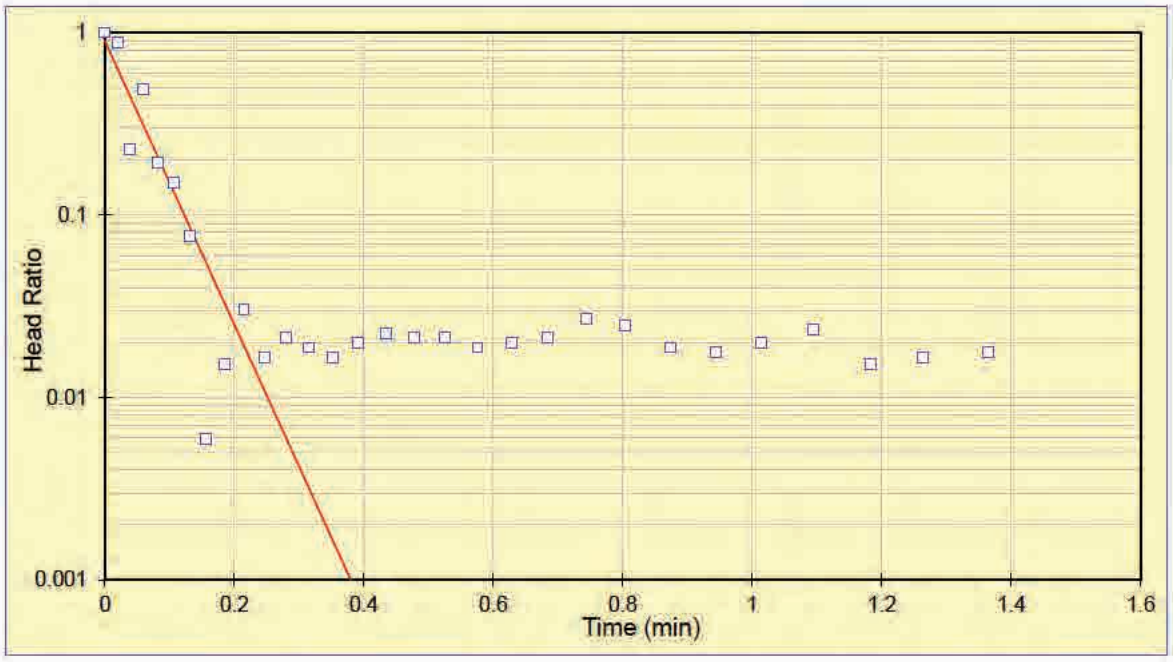
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.06E-02	cm/sec
t_1 =	0	K=	3.02E+01	ft/day
t_2 =	0.38			
h_1/h_0 =	0.90			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/08/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-15B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

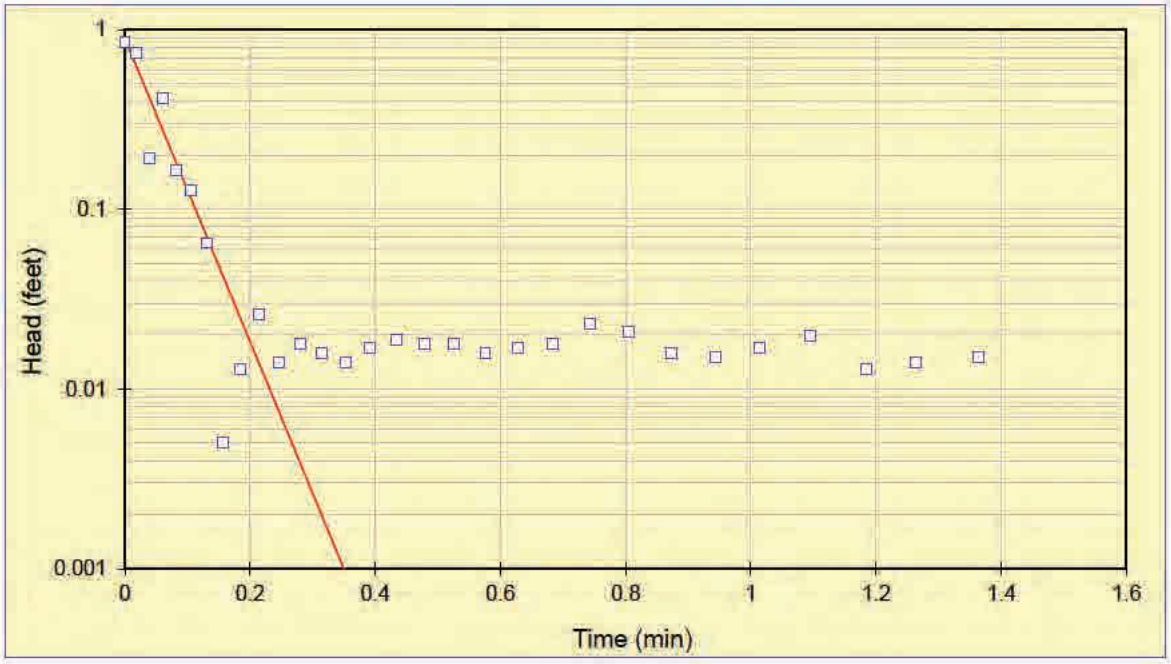
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	2.85
y_0 =	0.90
y_t =	0.001
t =	0.4

RESULTS

K=	9.79E-03	cm/sec
K=	2.77E+01	ft/day



Project Name: NIPSCO Schahfer
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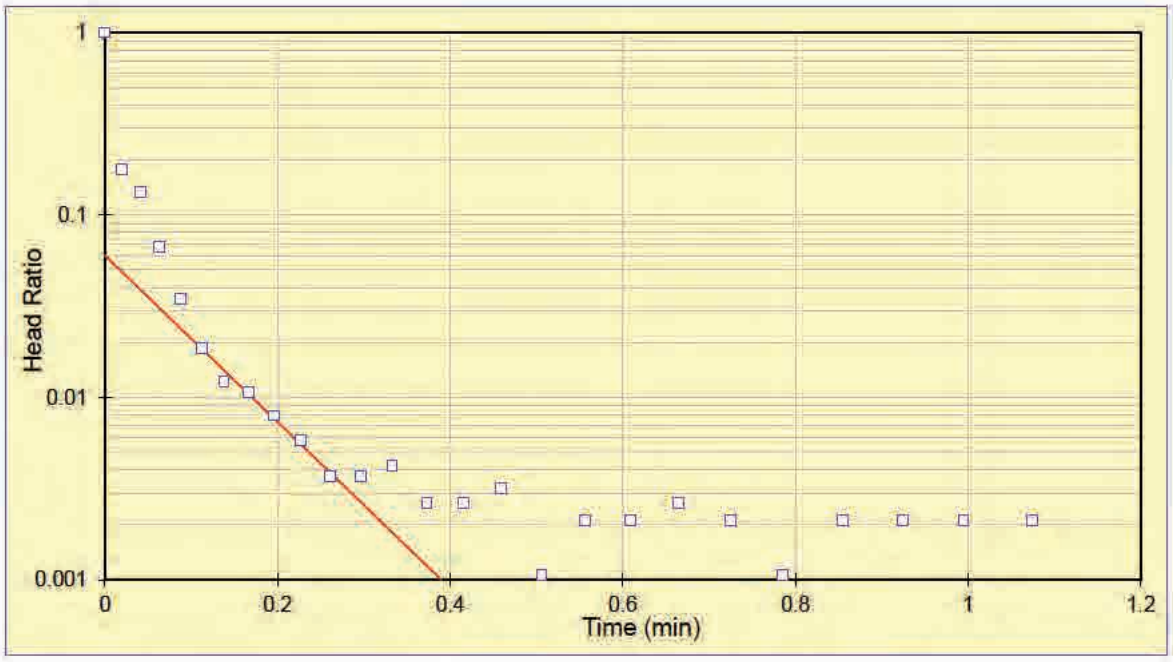
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19 (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.705	K=	3.70E-02	cm/sec
t_1 =	0	K=	1.05E+02	ft/day
t_2 =	0.39			
h_1/h_0 =	0.06			
h_2/h_0 =	0.00			



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Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19 (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

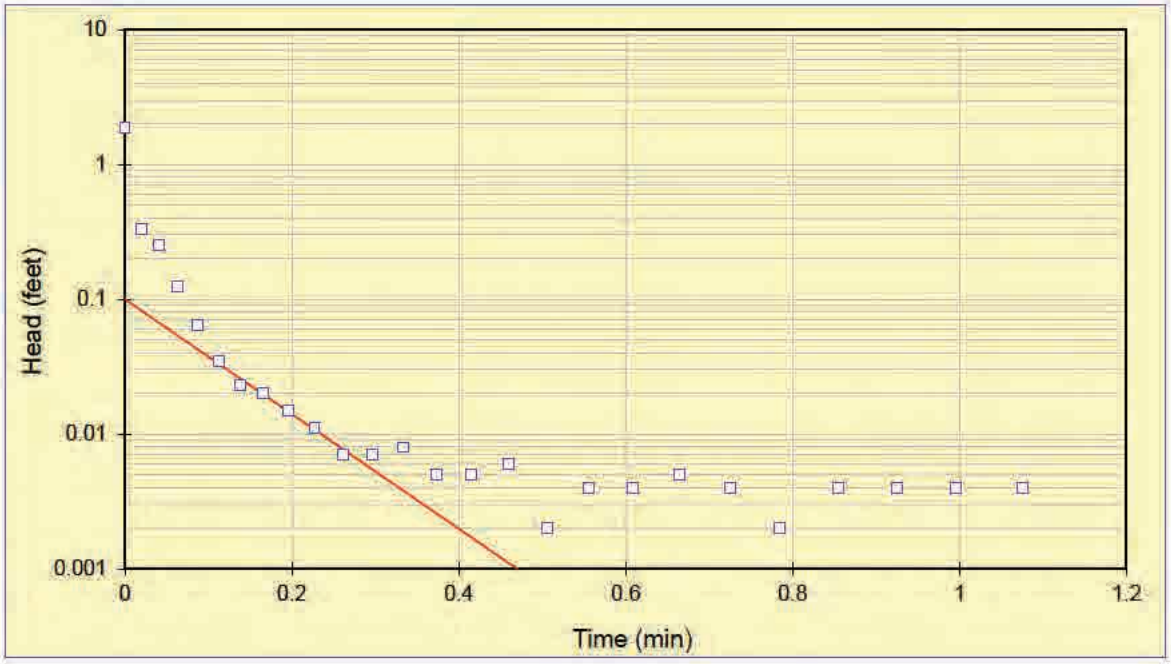
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.705
$\ln(R_e/r_w)$=	2.18
y_0 =	0.10
y_t =	0.001
t =	0.5

RESULTS

K=	2.25E-02	cm/sec
K=	6.38E+01	ft/day



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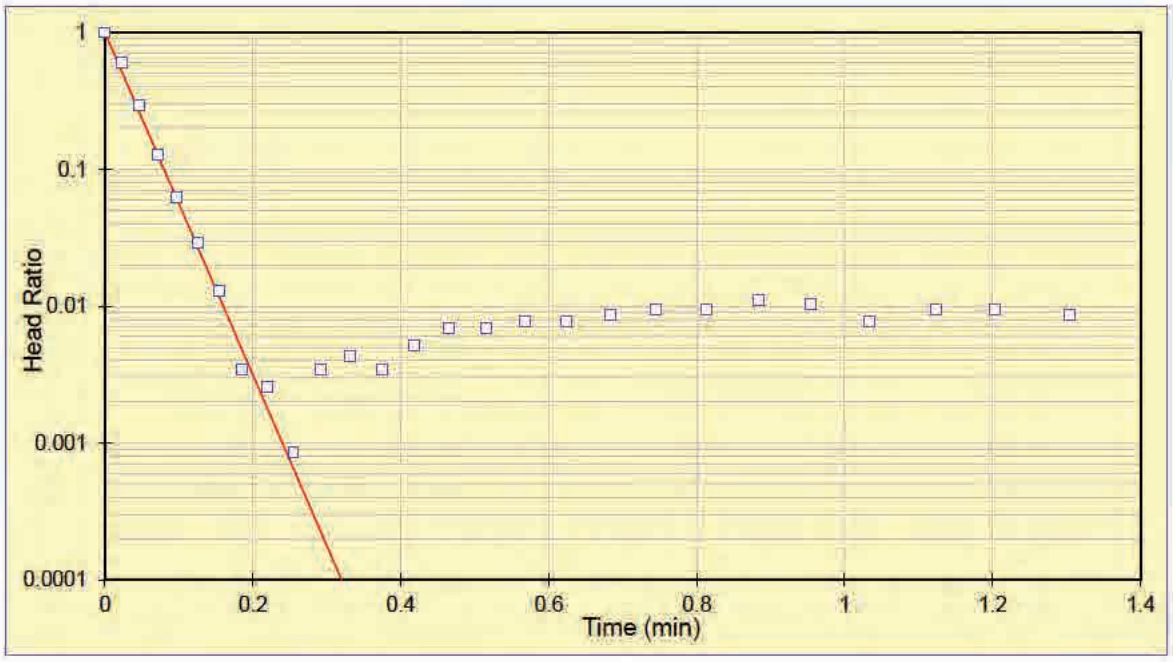
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19 (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.20			
R_e =	0.34			
L_e =	9.735	K=	1.01E-01	cm/sec
t_1 =	0	K=	2.87E+02	ft/day
t_2 =	0.32			
h_1/h_0 =	1.00			
h_2/h_0 =	0.00			



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Checked By: JRS
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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19 (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

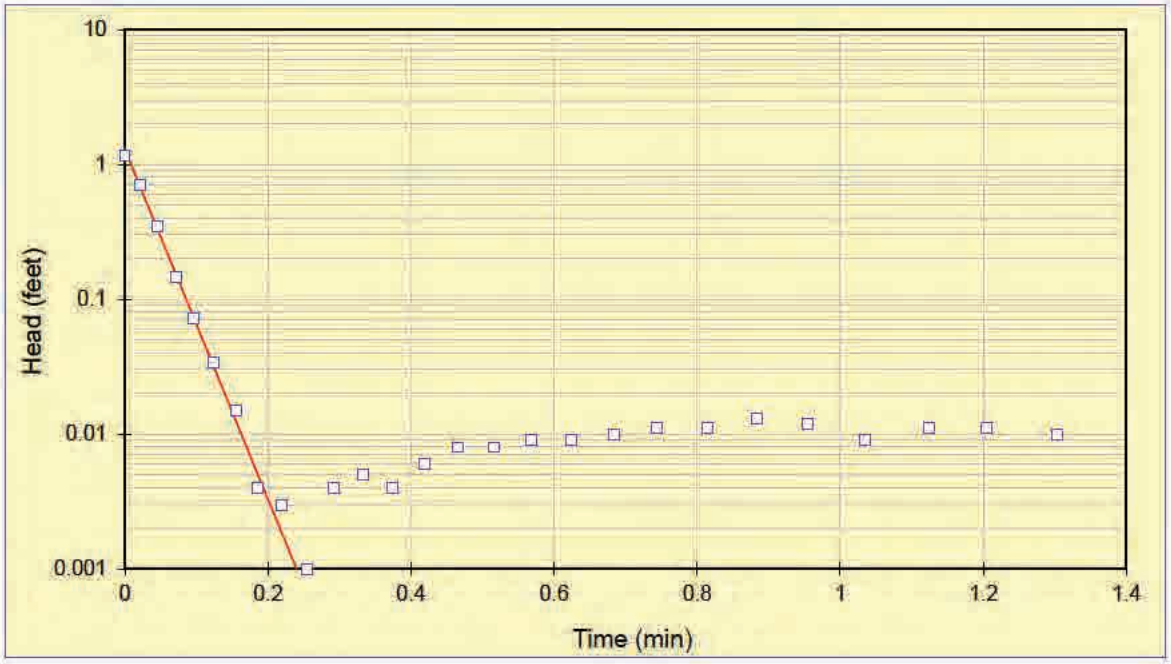
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.20
r_w =	0.34
L_e =	9.735
$\ln(R_e/r_w)$=	2.18
y_0 =	1.30
y_t =	0.001
t =	0.2

RESULTS

K=	6.85E-02	cm/sec
K=	1.94E+02	ft/day



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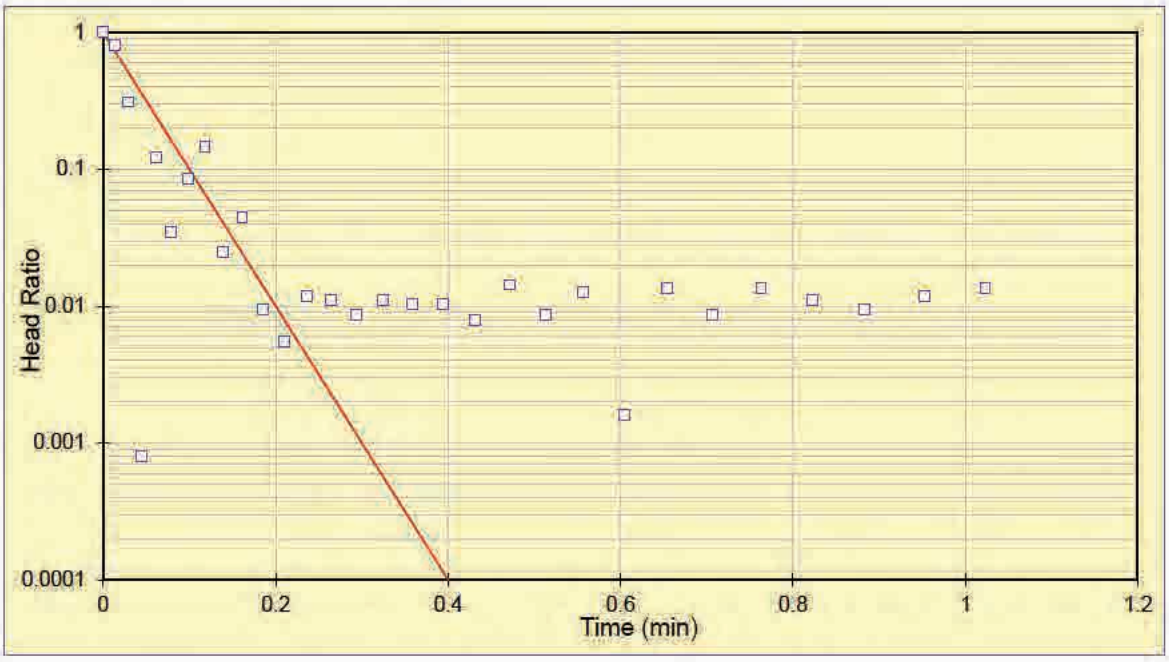
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-19B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.37E-02	cm/sec
t_1 =	0	K=	3.88E+01	ft/day
t_2 =	0.4			
h_1/h_0 =	1.00			
h_2/h_0 =	0.00			



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Analysis By: DFS
Checked By: JRS
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BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-19B (TEST 1)

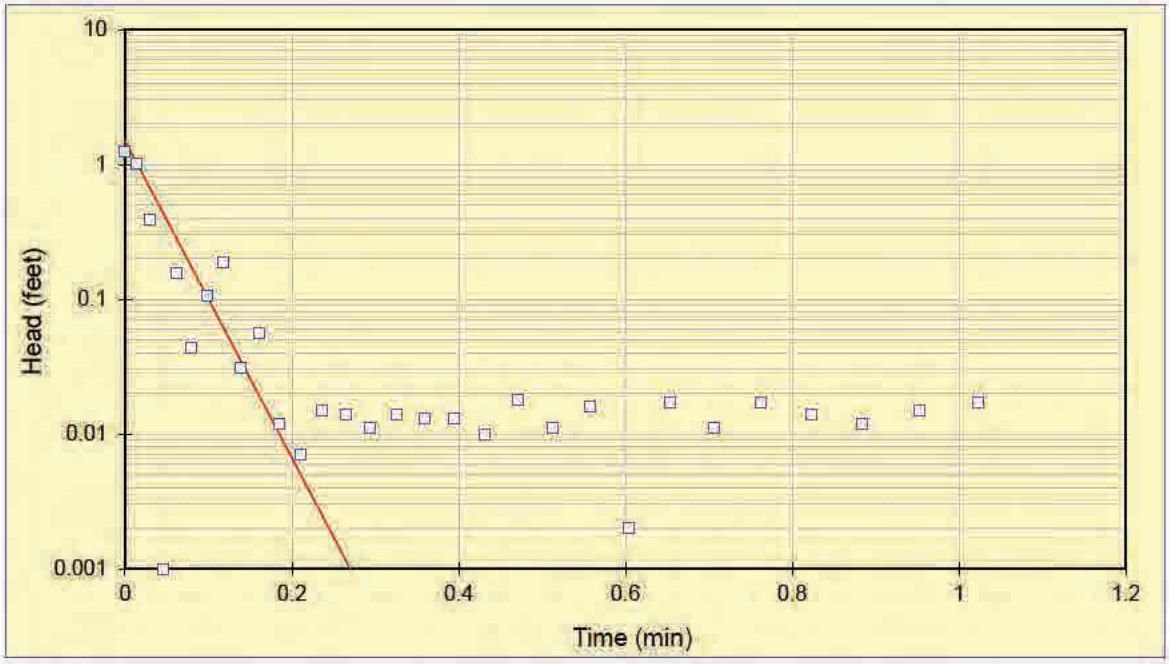
$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.02
y_0 =	1.50
y_t =	0.001
t =	0.3

RESULTS		
K=	1.44E-02	cm/sec
K=	4.09E+01	ft/day



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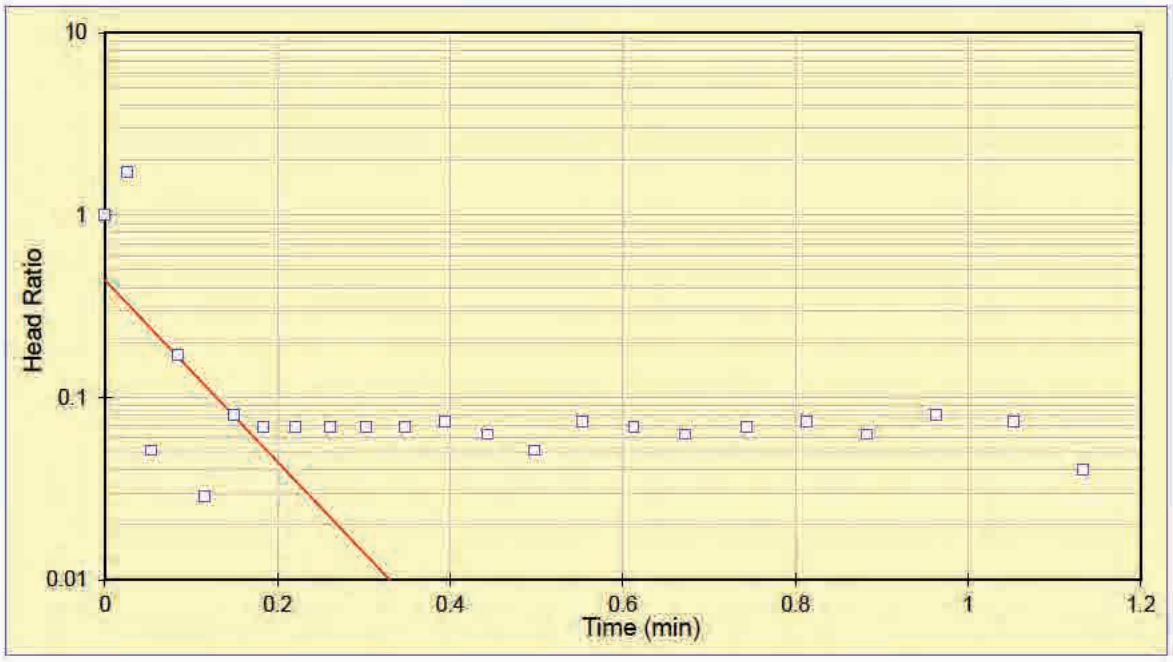
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

HVORSLEV SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-19B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	6.82E-03	cm/sec
t_1 =	0	K=	1.93E+01	ft/day
t_2 =	0.33			
h_1/h_0 =	0.44			
h_2/h_0 =	0.01			



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BOUWER AND RICE SLUG TEST ANALYSIS
FALLING HEAD TEST GAMW-19B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

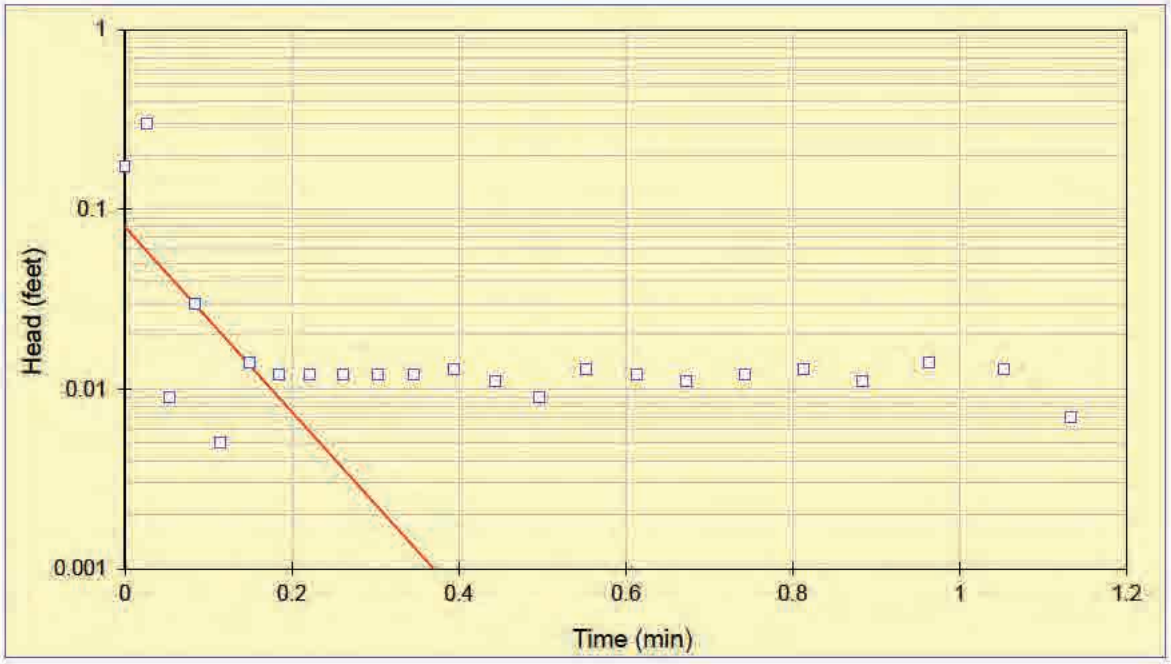
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.02
y_0 =	0.08
y_t =	0.001
t =	0.4

RESULTS

K=	6.31E-03	cm/sec
K=	1.79E+01	ft/day



Project Name: NIPSCO Schahfer
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Analysis By: DFS
Checked By: JRS
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van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-19B (TEST 1)

$$T = b + a \ln T$$

where:

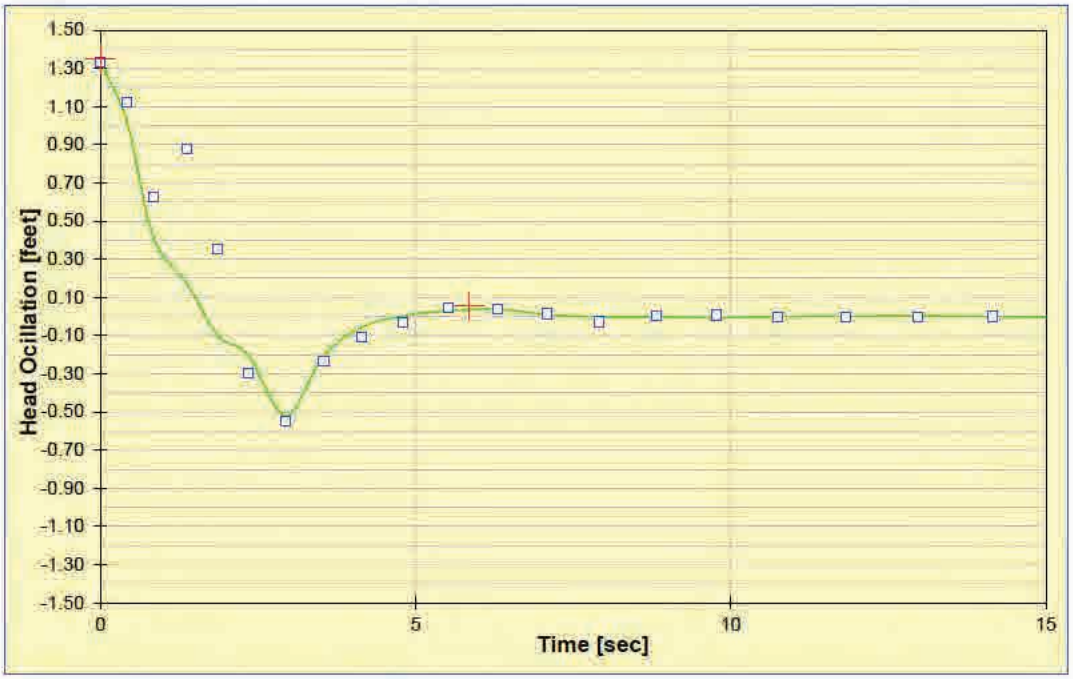
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma/(g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.20536	ft^2
r_s =	0.08	ft	d =	0.4539	ft^{-1}
L_c =	17.92	ft	a =	0.00231	ft^3
L_s =	10.00	ft	t_1 =	0.00	sec
w =	1.0740	ft^{-1}	t_2 =	5.85	sec
g =	0.5471	ft^{-1}	$h(t_1)$ =	1.35	ft
L =	22.16	ft^3/sec^2	$h(t_2)$ =	0.06	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.22E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.20E-02 ft^2/sec	$d < 0.7$?	YES
T =	1.04E+03 ft^2/day	L_1 =	22.16
K =	3.67E+01 ft/day	L_2 =	22.92
K =	1.29E-02 cm/sec	L_1:L_2 Diff <20% ?	YES



Project Name: NIPSCO RMSGS
Project No.: 164-8171
Test Date: 07/07/16

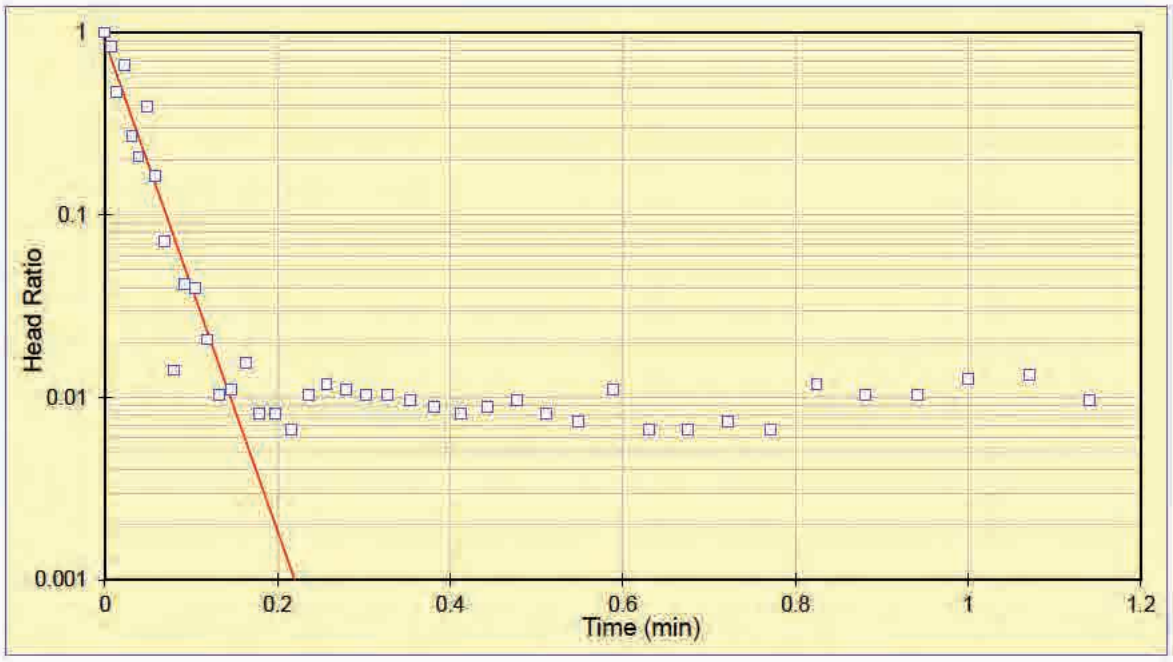
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19B (TEST 1)

$$K = \frac{r_c^2}{2L_e} \ln\frac{L_e}{R_e}\left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)}\right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.84E-02	cm/sec
t_1 =	0	K=	5.21E+01	ft/day
t_2 =	0.22			
h_1/h_0 =	0.90			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
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Analysis By: DFS
Checked By: JRS
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BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19B (TEST 1)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

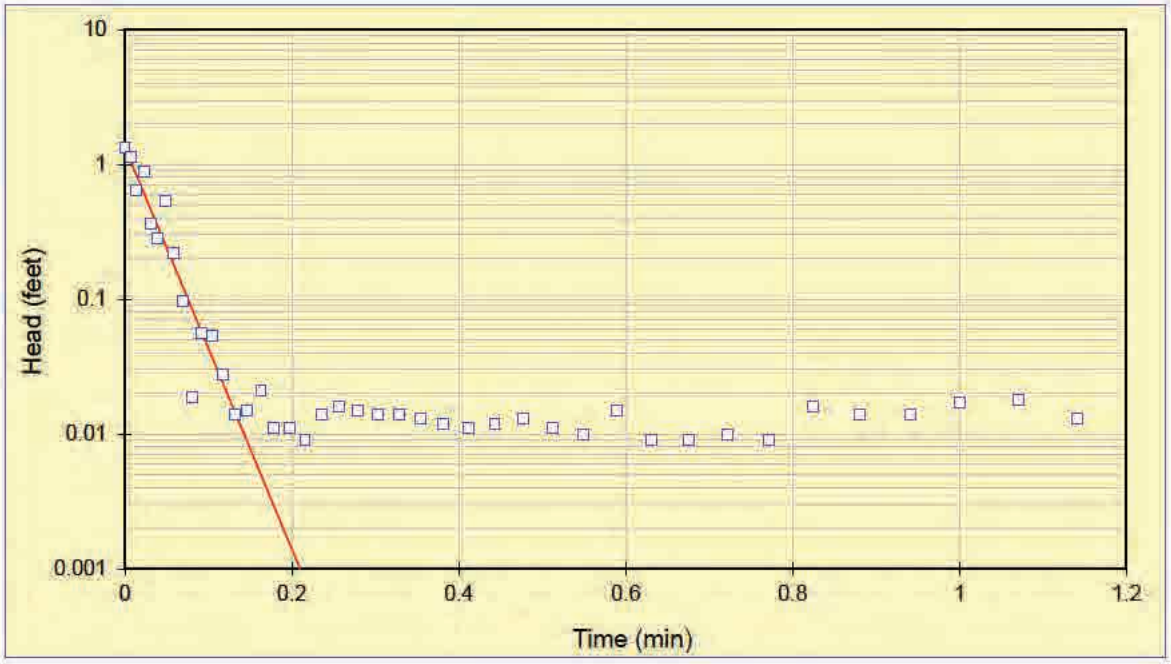
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.02
y_0 =	1.35
y_t =	0.001
t =	0.2

RESULTS

K=	1.83E-02	cm/sec
K=	5.18E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

van der KAMP RISING HEAD SLUG TEST ANALYSIS
UNDERDAMPED SLUG TEST GAMW-19B (TEST 2)

$$T = b + a \ln T$$

where:

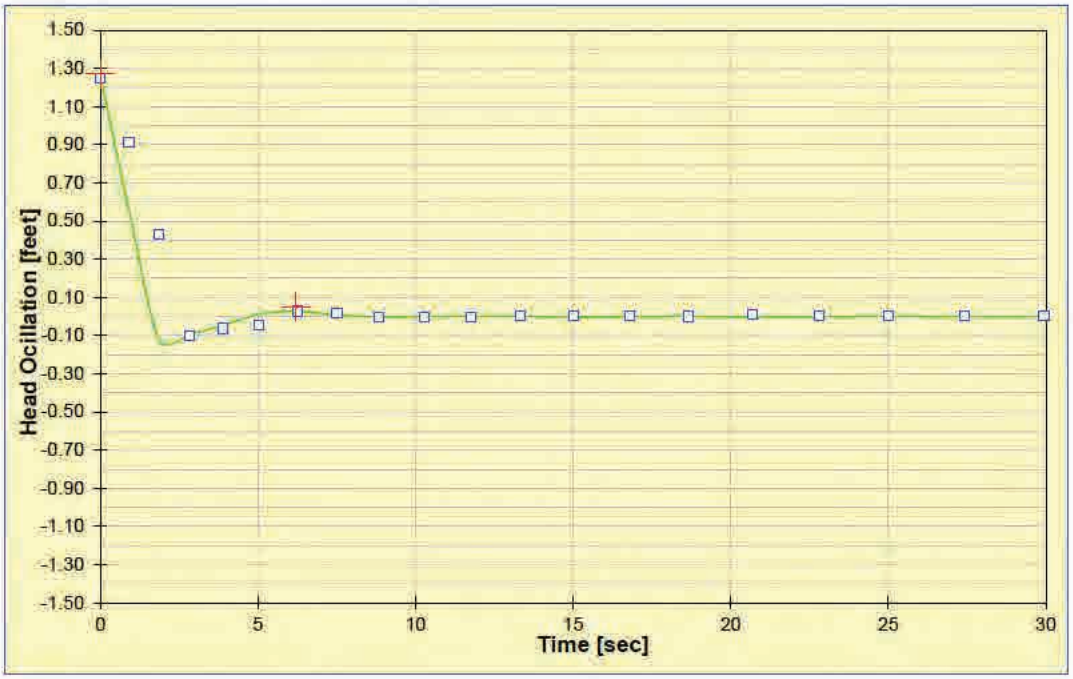
$$b = -a \ln\left[0.79 r_s^2 S (g/L)^{1/2}\right]$$
$$a = r_c^2 \left(g/L^{1/2}\right)/8d$$
$$d = \gamma / (g/L)^{1/2}$$
$$L = g/\left(\omega^2 + \gamma^2\right)$$

INPUT PARAMETERS

r_c =	0.08	ft	$(g/L)^{1/2}$ =	1.13983	ft^2
r_s =	0.08	ft	d =	0.4577	ft^{-1}
L_c =	17.95	ft	a =	0.00216	ft^3
L_s =	10.00	ft	t_1 =	0.00	sec
w =	1.0134	ft^{-1}	t_2 =	6.20	sec
g =	0.5217	ft^{-1}	$h(t_1)$ =	1.27	ft
L =	24.78	ft^3/sec^2	$h(t_2)$ =	0.05	ft
g =	32.19	ft/sec^2	S =	1.00E-02	dim

RESULTS

$b = T_0$ =	2.09E-02 ft^2/sec	$a < 0.1$?	YES
T =	1.12E-02 ft^2/sec	$d < 0.7$?	YES
T =	9.69E+02 ft^2/day	L_1 =	24.78
K =	3.43E+01 ft/day	L_2 =	22.95
K =	1.21E-02 cm/sec	L_1:L_2 Diff <20% ?	YES



Project Name: NIPSCO RMSGS
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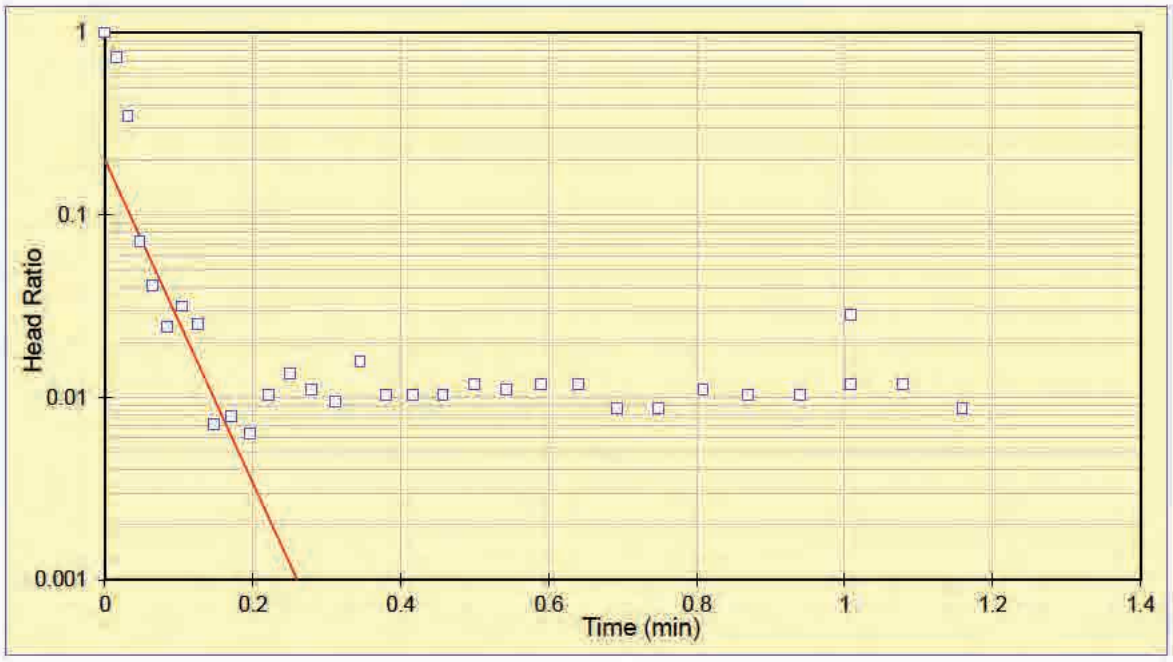
Analysis By: DFS
Checked By: JRS
Analysis Date: 7/31/2017

HVORSLEV SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19B (TEST 2)

$$K = \frac{r_c^2}{2L_e} \ln \frac{L_e}{R_e} \left[\frac{\ln\left(\frac{h_1}{h_2}\right)}{(t2 - t1)} \right] 30.48$$

where:
- r_c = casing radius (feet)
- R_e = equivalent radius (feet)
- L_e = length of screened interval (feet)
- t = time (minutes)
- h_t = head at time t (feet)

INPUT PARAMETERS		RESULTS		
r_c =	0.08			
R_e =	0.34			
L_e =	10	K=	1.21E-02	cm/sec
t_1 =	0	K=	3.43E+01	ft/day
t_2 =	0.26			
h_1/h_0 =	0.20			
h_2/h_0 =	0.00			



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

BOUWER AND RICE SLUG TEST ANALYSIS
RISING HEAD TEST GAMW-19B (TEST 2)

$$K = \frac{r_c^2 \ln\left(\frac{R_e}{r_w}\right)}{2L_e} \frac{1}{t} \ln\frac{y_0}{y_t}$$

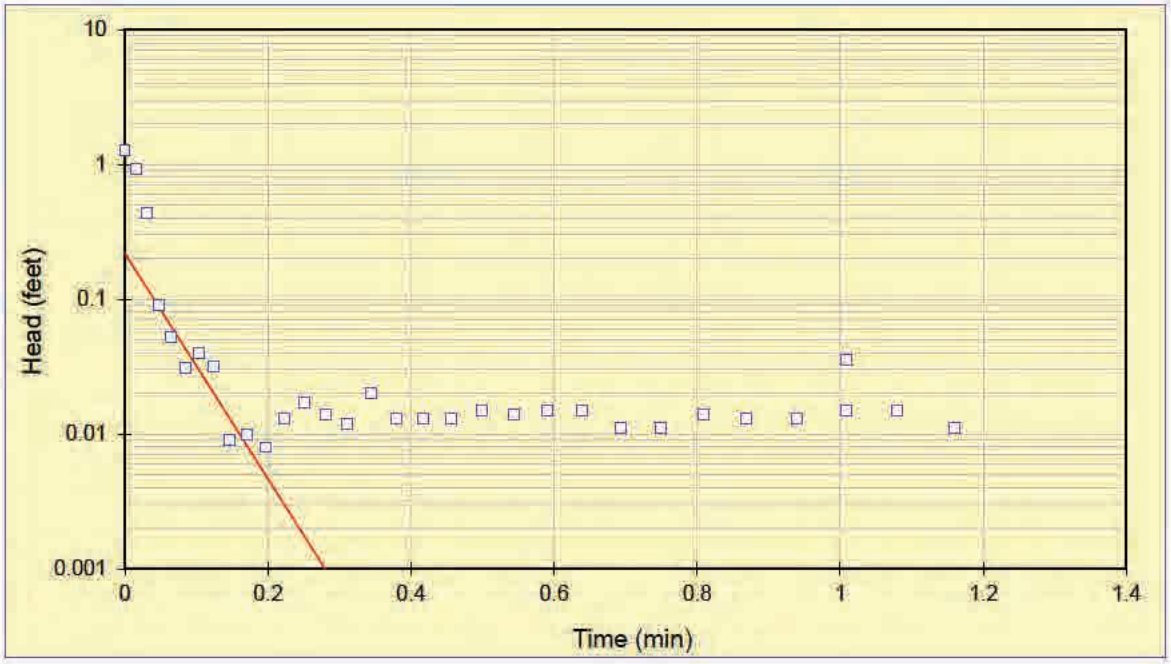
where:

r_c = casing radius (feet);
R_e = effective radius (feet);
L_e = length of screened interval (feet);
r_w = radial distance to undisturbed aquifer (feet)
y_0 = initial drawdown (feet)
y_t = drawdown (feet) at time t (minutes)

INPUT PARAMETERS	
r_c =	0.08
r_w =	0.34
L_e =	10
$\ln(R_e/r_w)$=	3.02
y_0 =	0.22
y_t =	0.001
t =	0.3

RESULTS

K=	1.03E-02	cm/sec
K=	2.91E+01	ft/day



Project Name: NIPSCO Schahfer
Project No.: 164-8171
Test Date: 07/07/16

Analysis By: DFS
Checked By: JRS
Analysis Date: 7/27/2016

APPENDIX C

Vertical Gradient Calculation

APPENDIX C

Vertical Gradient Calculation

Appendix D
VERTICAL GRADIENT FLOW CALCULATIONS

Monitoring Well Locations	Ground Surface Elevation (ft-masl)	Top of Casing Elevation (ft-masl)	Screen Interval				June 13, 2016				July 11, 2016				September 9, 2016				November 2, 2016			
			Top (ft-bgs)	Bottom (ft-bgs)	Center (ft-bgs)	Center (ft-masl)	Depth To Water (ft-btoc)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-btoc)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-btoc)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-btoc)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction
GAWW01	993.02	993.94	5	15	10	983.02	10.77	983.17			10.84	983.10			10.85	983.09			11.00	982.94		
GAWW01B	993.01	993.93	20	40	30	963.01													11.04	982.90	-0.0018	Down
GAWW02	992.45	992.76	5	15	10	982.45	9.91	982.85							9.91	982.85			10.14	982.62		
GAWW02B	992.40	992.76	20	35	27	965.40													10.14	982.62	-0.0458	Down
GAWW03	992.16	992.49	5	15	10	982.16	9.62	982.54			10.29	981.89			9.11	983.04			9.52	982.63		
GAWW03B	992.16	992.54	24.5	34.5	29.5	962.66	9.75	982.54	-0.180-02	Down	9.81	982.48	-0.145-02	Down	8.15	983.11	-0.245-02	Down	9.68	982.67	-0.0459	Down
GAWW10	993.21	993.05	5	15	10	983.04	9.52	983.53			9.82	983.23			9.22	983.83			9.36	983.69		
GAWW10B	993.11	993.05	29.3	37.1	33.2	959.91	9.15	983.90	-0.417-03	Down	9.42	983.63	0.00E+00	Flat	9.18	983.87	1.67E-03	up	8.96	984.09	0.0000	up
GAWW11E	992.57	992.97	5	15	10	982.57	9.21	983.76	-0.00E-00	Down	9.61	983.36	1.46E-01	up	9.18	983.79	-0.45E-01	up	8.32	984.65	0.960-02	up
GAWW11B	992.70	992.76	70.76	74.71	72.74	919.96	8.91	983.85			8.80	983.96			7.91	984.85			8.64	983.13		
GAWW11C	993.01	992.80	5	15	10	983.01	9.19	983.61			9.29	983.51			10.05	982.75			9.25	983.55		
GAWW12B	992.83	993.05	28	38	33	957.83	10.79	982.26	-0.22E-03	up	9.77	983.28	0.61E-01	Down	10.05	982.99	4.22E-02	Down	10.23	982.81	0.23E-01	Down
GAWW16	993.74	994.07	5	15	10	983.74	9.75	983.99			9.96	983.77			9.44	984.29			9.80	983.93	0.90E-02	Down
GAWW16B	993.64	993.47	25	35	30	958.64	--	--			--	--			--	--			9.54	983.93		
GAWW18B	991.00	990.83	5	15	10	981.00	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	9.06	981.94	-0.11E-01	Down
GAWW19B	993.90	993.79	22	32	27	966.90	--	--			--	--			--	--			9.05	984.74		
GAWW20	994.27	993.72	5	15	10	984.27	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	9.06	984.66	1.66E-03	Up
GAWW20B	992.20	992.93	27	37	32	960.20	--	--			--	--			--	--			9.05	983.89		
GAWW53	991.89	991.54	5	15	10	981.89	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	8.85	983.04	1.42E-03	Up
GAWW53B	992.17	992.04	28	38	33	959.17	--	--			--	--			--	--			8.87	983.30		
GAWW54	992.97	992.57	5	15	10	982.97	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	9.05	983.92	1.81E-03	up
GAWW54B	992.99	992.67	32	42	37	955.99	--	--			--	--			--	--			8.87	984.12		
GAWW55	992.95	992.84	5	15	10	982.95	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	8.54	984.30	0.00E+00	Flat
GAWW55B	992.16	992.93	25	35	30	962.16	--	--			--	--			--	--			8.54	984.39		
GAWW56	992.43	992.61	5	15	10	982.43	--	--	NA	NA	--	--	NA	NA	--	--	NA	NA	7.90	984.71	-0.00E+00	Down
GAWW56B	992.35	992.84	30	40	35	957.35	--	--			--	--			--	--			7.90	984.77		

Notes:
ft-bgs = Feet below ground surface
ft-msl = Feet above mean sea level
ft-btoc = Feet below top of casing
NA = Not applicable

Monitoring Well Location	Ground Surface Elevation (ft-masl)	Top of Casing Elevation (ft-masl)	Screen Interval				January 4, 2017				February 21, 2017				April 24, 2017				June 26, 2017			
			Top (ft-bgs)	Bottom (ft-bgs)	Center (ft bgs)	Center (ft masl)	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction
GAMW07	991.15	993.94	5	15	10	981.15	10.08	983.86	1.10E-03	Down	9.85	984.09	1.07E-03	Down	9.85	984.09	NA	NA	9.80	984.14	NA	NA
GAMW07B	991.61	994.10	39	42	40	951.61	9.69	984.41			9.67	984.43			9.71	984.39			9.70	984.40		
GAMW08	992.45	995.15	5	15	10	982.45	10.60	984.55	1.64E-03	Up	10.63	984.52	2.61E-03	Down	9.71	985.44	NA	NA	10.15	984.99	NA	NA
GAMW08B	979.15	981.97	20	35	27	952.15	9.21	984.76			9.07	984.90			--	--	--	--	--	--	--	--
GAMW09	990.1	992.86	5	15	10	980.1	9.49	983.37	3.20E-03	Down	9.50	983.36	2.70E-03	Down	9.25	984.22	0.03E-03	Down	9.30	984.09	2.1E-03	Down
GAMW09B	993.19	995.94	34.5	44.5	39.5	953.69	9.85	984.81			9.81	984.85			9.26	985.40			9.80	985.21		
GAMW10	993.17	995.95	5	15	10	983.17	9.83	984.82	1.22E-03	Up	9.86	984.80	1.84E-03	Up	7.60	987.38	1.47E-03	Up	9.80	985.05	0.00E+00	NA
GAMW10B	993.18	995.95	37.5	47.5	42.5	950.68	9.13	984.82			9.11	984.84			8.77	985.24			9.80	985.35		
GAMW11	992.7	995.37	5	15	10	982.7	9.33	984.14	1.63E-03	Up	9.46	983.91	1.02E-03	Up	9.27	984.10	0.97E-03	Up	9.72	983.65	1.93E-03	Up
GAMW11B	992.76	995.76	47.76	52.76	50.26	942.50	9.71	984.05			9.70	984.06			9.34	984.42			9.68	984.08		
GAMW12	993.51	996.80	5	15	10	983.51	NA	--	NA	NA	12.49	984.31	0.00E+00	Up	11.35	985.45	9.46E-04	Up	12.31	984.49	1.56E-03	Up
GAMW12B	993.43	996.08	35	45	40	953.43	11.60	984.48			11.54	984.54			11.60	984.48			11.58	984.50		
GAMW13	993.74	996.57	5	15	10	983.74	9.68	984.11	6.23E-03	Down	9.84	983.95	1.03E-03	Down	9.45	984.34	NA	NA	9.85	983.95	NA	NA
GAMW13B	993.54	996.47	25	35	30	963.54	9.93	984.04			9.91	984.06			--	--	--	--	--	--	--	--
GAMW14	991.09	993.74	5	15	10	981.09	9.73	983.76	-3.06E-04	Down	9.69	983.80	1.88E-04	Up	--	--	NA	NA	--	--	NA	NA
GAMW14B	991.07	993.74	22	32	27	964.08	9.75	983.84			9.69	983.90			--	--	--	--	--	--	--	--
GAMW15	994.27	996.93	5	15	10	984.27	9.77	987.14	9.10E-03	Up	9.76	985.04	2.05E-03	Up	--	--	NA	NA	--	--	NA	NA
GAMW15B	992.29	994.83	37	47	42	950.29	9.78	985.01			9.65	985.21			--	--	--	--	--	--	--	--
GAMW16	990.89	993.54	5	15	10	980.89	9.55	984.00	4.81E-03	Up	9.61	983.93	2.37E-03	Up	--	--	NA	NA	--	--	NA	NA
GAMW16B	990.91	993.52	26	36	31	954.90	9.85	983.67			9.81	983.71			--	--	--	--	--	--	--	--
GAMW17	990.97	993.57	5	15	10	980.97	9.58	983.99	3.92E-03	Up	9.61	983.96	2.80E-03	Up	--	--	NA	NA	--	--	NA	NA
GAMW17B	990.99	993.67	32	42	37	948.99	9.63	984.04			9.62	984.05			--	--	--	--	--	--	--	--
GAMW18	990.95	993.54	5	15	10	980.95	9.62	983.92	1.50E-03	Down	9.80	983.74	1.93E-03	Down	--	--	NA	NA	--	--	NA	NA
GAMW18B	990.16	992.93	45	55	50	940.16	9.81	983.12			9.76	983.17			--	--	--	--	--	--	--	--
GAMW19	990.23	992.91	5	15	10	980.23	9.55	983.36	1.50E-03	Down	9.65	983.26	4.04E-03	Down	--	--	NA	NA	--	--	NA	NA
GAMW19B	990.33	992.91	50	60	55	935.33	9.79	983.12			9.65	983.26			--	--	--	--	--	--	--	--

Notes:
Bold = Well located in groundwater mound
Italic = Well above mound (sump)
Bold = Well below mound (deep)
NA = Not applicable
*Min = Minimum detectable

Appendix C
VERTICAL GRADIENT FLOW CALCULATIONS

Monitoring Well Locations	Ground Surface Elevation (ft-masl)	Top of Casing Elevation (ft-masl)	Screen Interval				August 21, 2017				October 2, 2017				February 26, 2018				March 12, 2018			
			Top (ft-bgs)	Bottom (ft-bgs)	Center (ft bgs)	Center (ft masl)	Depth To Water (ft-bgs)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bgs)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bgs)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bgs)	Groundwater Elevation (ft-masl)	Vertical Gradient (m/m)	Flow Direction
GAMW09	993.02	993.94	5	15	10	983.02	10.92	983.02	NA	NA	10.75	983.19	NA	NA	–	–	NA	NA	9.8	984.06	NA	NA
GAMW09R	994.67	995.02	290	40	35	959.67	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW08	992.45	992.76	5	15	10	982.45	10.10	982.53	NA	NA	NA	–	NA	NA	–	–	NA	NA	9.38	983.38	NA	NA
GAMW08B	979.52	980.40	20	35	27	952.52	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW04	992.1	992.96	5	15	10	982.01	9.11	983.85	0.0018/0.02	Down	10.25	982.85	0.0015/0.02	Down	–	–	NM	NM	9.29	983.67	0.0018/0.02	Down
GAMW08R	993.19	993.56	294.5	345	319.5	674.69	1.65	991.91			9.81	983.38			–	–			9.92	983.27		
GAMW10	993.01	993.95	5	15	10	983.01	9.66	984.29	0.0007/0.02	Up	9.80	984.21	0.0008/0.02	Up	–	–	NM	NM	9.36	984.65	0.0007/0.02	Up
GAMW10B	993.14	993.95	29.3	33.1	31.1	962.04	7.33	986.72			8.17	985.78			–	–			7.96	985.99		
GAMW11	992.0	992.97	5	15	10	982.0	9.85	983.12	0.0004/0.02	Up	10.68	982.29	0.0003/0.02	Up	–	–	NM	NM	9.36	983.64	0.0003/0.02	Up
GAMW11B	992.16	992.76	170.16	174.76	172.46	819.70	7.64	985.12			8.87	983.89			–	–			8.67	984.09		
GAMW11	993.51	994.83	5	15	10	983.51	10.56	984.27			NA				–	–			10.45	984.38		
GAMW11B	993.63	993.0	35	55	45	948.63	10.95	982.05	0.0006/0.02	Down	9.73	983.27	0.0007/0.02	Down	–	–	NM	NM	9.12	984.18	0.0006/0.02	Down
GAMW16	993.74	994.19	5	15	10	983.74	9.73	984.46			11.71	982.48			–	–			9.8	984.37		
GAMW16B	993.68	993.47	35	55	45	948.68	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW01	991.00	992.69	5	20	13	978.00	–	–	NA	NA	–	–	NA	NA	–	–	NM	NM	–	–	NM	NM
GAMW08	993.80	993.74	22	32	27	966.80	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW02	994.27	994.10	5	15	10	984.27	–	–	NA	NA	–	–	NA	NA	–	–	NM	NM	–	–	NM	NM
GAMW02B	994.20	993.93	37	57	52	942.20	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW03	995.89	997.24	5	15	10	985.89	–	–	NA	NA	–	–	NA	NA	–	–	NM	NM	–	–	NM	NM
GAMW03B	995.91	997.76	36	56	71	952.82	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW04	992.97	993.37	5	15	10	982.97	–	–	NA	NA	–	–	NA	NA	–	–	NM	NM	–	–	NM	NM
GAMW04B	992.99	993.47	38	58	48	944.99	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW05	992.05	992.84	5	15	10	982.05	–	–	NA	NA	–	–	NA	NA	–	–	NM	NM	–	–	NM	NM
GAMW05B	992.18	992.83	35	55	45	947.18	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–
GAMW06	992.03	992.84	5	15	10	982.03	–	–	NA	NA	–	–	NA	NA	–	–	NM	NM	–	–	NM	NM
GAMW06B	992.33	992.84	35	55	45	947.33	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–	–

Notes:
bgs = Feet below ground surface
masl = Feet above mean sea level
ft-bgs = Feet below top of casing
NA = Not Available
NM = Not Measured

Monitoring Well Location	Ground Surface Elevation (ft-asl)	Top of Casing Elevation (ft-asl)	Screen Interval				April 13, 2016				June 12, 2016				August 27-30, 2016				October 22-24, 2016			
			Top (ft-bgs)	Bottom (ft-bgs)	Center (ft-bgs)	Center (ft-asl)	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-asl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-asl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-asl)	Vertical Gradient (m/m)	Flow Direction	Depth To Water (ft-bTOC)	Groundwater Elevation (ft-asl)	Vertical Gradient (m/m)	Flow Direction
GAMW09	691.62	693.94	5	15	10	681.62	9.99	683.95	7.70E-01	Up	9.70	684.24	1.71E-01	Up	9.95	683.99	3.43E-01	Up	10.07	683.87	1.71E-01	Up
GAMW09B	691.67	693.93	39	49	44	647.67	9.32	684.61			9.30	684.63			9.58	684.35			10.17	683.76		
GAMW08	692.45	694.76	5	15	10	682.45	9.84	684.92	1.03E-01	Up	9.60	685.17	1.03E-01	Up	12.32	682.45	1.20E-03	Up	11.16	683.62	2.56E-01	Up
GAMW08B	692.52	694.82	40	50	45	647.52	9.79	685.03			9.80	685.02			9.84	684.98			9.95	684.87		
GAMW06	690.1	692.56	5	15	10	680.1	7.42	685.14	2.07E-02	Down	7.5	685.06	2.15E-02	Down	9.52	683.04	2.04E-02	Down	8.66	683.90	2.04E-02	Down
GAMW06B	690.19	692.76	49.5	54.5	52	638.19	7.14	685.62			7.25	685.51			9.15	683.61			8.29	684.47		
GAMW15	693.07	695.25	5	15	10	683.07	9.83	685.42			9.8	685.45			9.58	685.67			8.93	686.31		
GAMW15B	693.11	695.08	29.1	37.1	33.1	660.01	7.4	687.68	9.63E-03	Up	8.85	686.26	1.04E-02	Up	8.93	686.18	1.93E-02	Up	8.002	687.11	1.77E-02	Up
GAMW16	692.07	693.97	5	15	10	682.07	8.15	685.82	5.59E-03	Up	8.36	685.61	9.14E-03	Up	9.95	684.02	1.72E-03	Up	8.7	685.27	2.14E-03	Up
GAMW16B	692.13	693.76	47.16	54.71	50.76	641.84	6.45	687.31			7.5	686.26			9.24	684.52			8.65	685.10		
GAMW17	693.51	695.83	5	15	10	683.51	11.35	684.48			11.45	684.38			11.66	684.17			10.7	685.13		
GAMW17B	693.63	695.6	35	45	40	653.63	10.42	685.18	4.98E-03	Up	10.23	685.38	5.00E-03	Up	10	685.6	2.11E-03	Down	9.43	686.18	2.11E-03	Down
GAMW18	693.74	695.57	5	15	10	683.74	9.47	686.1			9.72	685.85			9.98	685.59			8.7	686.87		
GAMW18B	693.64	695.47	25	35	30	663.64	9	686.47	1.39E-03	Up	8.93	686.71	1.93E-03	Up	9.28	686.36	1.11E+00	Up	8.32	687.32	2.89E-03	Up
GAMW07	691.09	692.63	5	15	10	681.09			NA	NA	7.07	685.56	-1.55E-04	Down	9.14	683.52	-1.03E+00	Down	8.29	684.37	-1.03E+00	Down
GAMW08	690.93	692.74	22	32	27	674.08	–	–			7.06	685.87			9.24	683.56			8.39	684.42		
GAMW10	694.27	696.13	5	15	10	684.27	–	–	–	–	–	–	–	–	9.55	686.58	–	–	9.06	687.07	–	–
GAMW10B	694.29	696.13	37	47	42	652.29	–	–	NA	NA	–	–	0.0	NA	9.55	686.58	0.00E+00	No	9.06	687.07	0.00E+00	No
GAMW05	690.39	692.24	5	15	10	680.39	–	–	NA	NA	7.03	685.21	1.72E-02	Up	8.85	683.44	5.67E-03	Up	8.10	684.19	1.15E-02	Up
GAMW05B	690.41	692.24	26	36	31	659.41	–	–			7.05	685.19			8.77	683.47			9.05	685.19		
GAMW04	692.97	695.37	5	15	10	682.97	7.23	–	–	–	7.05	688.32	–	–	7.58	687.79	–	–	7.09	688.27	–	–
GAMW04B	693.02	695.47	32	42	37	656.98	7.32	688.15	1.83E-03	Up	7.07	688.40	9.47E-03	Up	7.72	687.75	3.81E-03	Down	6.92	688.52	3.81E-03	Down
GAMW05	690.05	691.94	5	15	10	680.05	–	–	NA	NA	6.84	685.09	3.02E-02	Up	9.01	682.92	2.93E-03	Down	6.93	685.01	3.04E-03	Down
GAMW06	695.16	697.03	35	45	40	655.16	–	–			6.86	690.17			9.03	688.00			6.95	690.08		
GAMW06B	695.23	697.01	5	15	10	685.23	–	–	NA	NA	6.84	690.17	-9.68E-04	Down	9.06	687.78	1.93E-03	Up	6.93	690.06	1.93E-03	Up
GAMW07	695.33	697.31	37	47	42	653.33	–	–			7.05	690.26			9.03	688.28			6.93	690.38		

Notes:
Bold = Well screen groundwater head
Italics = Well screen mean sea level
Italics = Calculation Result
NM = Not Measured
NA = Not Available

Appendix C
VERTICAL GRADIENT FLOW CALCULATIONS

Monitoring Well Locations	Ground Surface Elevation (masl)	Top of Casing Elevation (masl)	Screen Interval				February 23, 2016				Average Vertical Gradient (m/m)	Flow Direction
			Top (m bgs)	Bottom (m bgs)	Center (m bgs)	Center (masl)	Depth To Water (m BTOC)	Groundwater Elevation (masl)	Vertical Gradient (m/m)	Flow Direction		
DMW07	1000.23	999.95	5	10	7.5	992.45	10.55	989.40				
DMW10S	999.61	999.33	10	13	11.5	988.11	8.33	991.28	0.05E-02	Up	0.0030	Up
DMW11S	999.95	999.66	5	11	8	991.95	8.61	991.05				
DMW11D	999.92	999.61	45	51	48	951.95	8.13	991.48	0.00E+00	Up	0.0031	Up
DMW12S	1001.1	1000.99	7	13	10	991.10	9.05	991.21				
DMW12D	999.83	999.53	84.5	91.5	88.0	911.83	8.48	991.47	-0.04E-02	Down	-0.0214	Down
DMW13	999.07	998.79	5	10	7.5	991.57	7.68	991.39				
DMW15S	998.1	998.06	37.9	47.3	42.6	955.46	7.07	991.04	0.03E-02	Up	0.0018	Up
DMW15I	998.2	998.10	5	13	9	989.17	8.20	989.94				
DMW15D	998.19	997.79	97.79	99.16	98.78	899.04	8.22	989.61	0.03E-02	up	0.0020	Up
DMW16	998.81	998.43	5	15	10	988.81	11.84	986.27				
DMW17S	997.96	997.6	24	34	29	968.96	12.35	985.44	-0.23E-02	Down	-0.0111	Down
DMW17I	998.03	997.77	5	15	10	988.03	8.84	987.35				
DMW18S	999.04	998.47	25	33	29	970.04	6.55	992.22	0.10E-02	Up	0.0050	Up
DMW18D	997.90	997.49	81	91	86	911.90	5.96	991.93				
DMW19S	991.46	991.79	22	32	27	964.46	7.93	991.08	-0.05E-02	Up	-0.0193	Down
DMW19I	994.01	993.73	5	15	10	984.01	8.10	990.99				
DMW20S	993.60	993.33	25	30	32	962.57	8.29	990.30	0.02E-02	Up	0.0009	Up
DMW21	994.68	991.24	5	15	10	984.68	8.48	990.70	0.02E-02	Up	0.0008	Up
DMW22S	993.65	991.39	25	35	31	963.65	9.05	990.94				
DMW22I	993.89	993.21	5	15	10	988.89	8.09	990.96	0.02E-02	Down	0.0004	Up
DMW23S	993.06	992.47	55	65	60	938.06	7.98	990.37				
DMW23I	992.99	992.68	5	15	10	982.99	8.65	990.61	0.00E+00	Up	0.0002	Down
DMW23D	993.05	992.63	75	85	80	918.05	7.93	990.71				
DMW24S	991.62	991.3	5	15	10	981.62	7.91	990.70	0.00E+00	Down	0.0001	Down
DMW24D	991.55	991.42	75	85	80	911.55	7.93	990.70				

Notes:
Mbgs = Meters below ground surface
Masl = Meters above mean sea level
mBTOC = Meters below top of casing
BGL = Feet Below
NA = Not available

Prepared by: EMW
Checked by: TV
Reviewed by: MAH

APPENDIX D

Monitored Natural Attenuation Evaluation

GOLDER

REPORT

MONITORED NATURAL ATTENUATION EVALUATION

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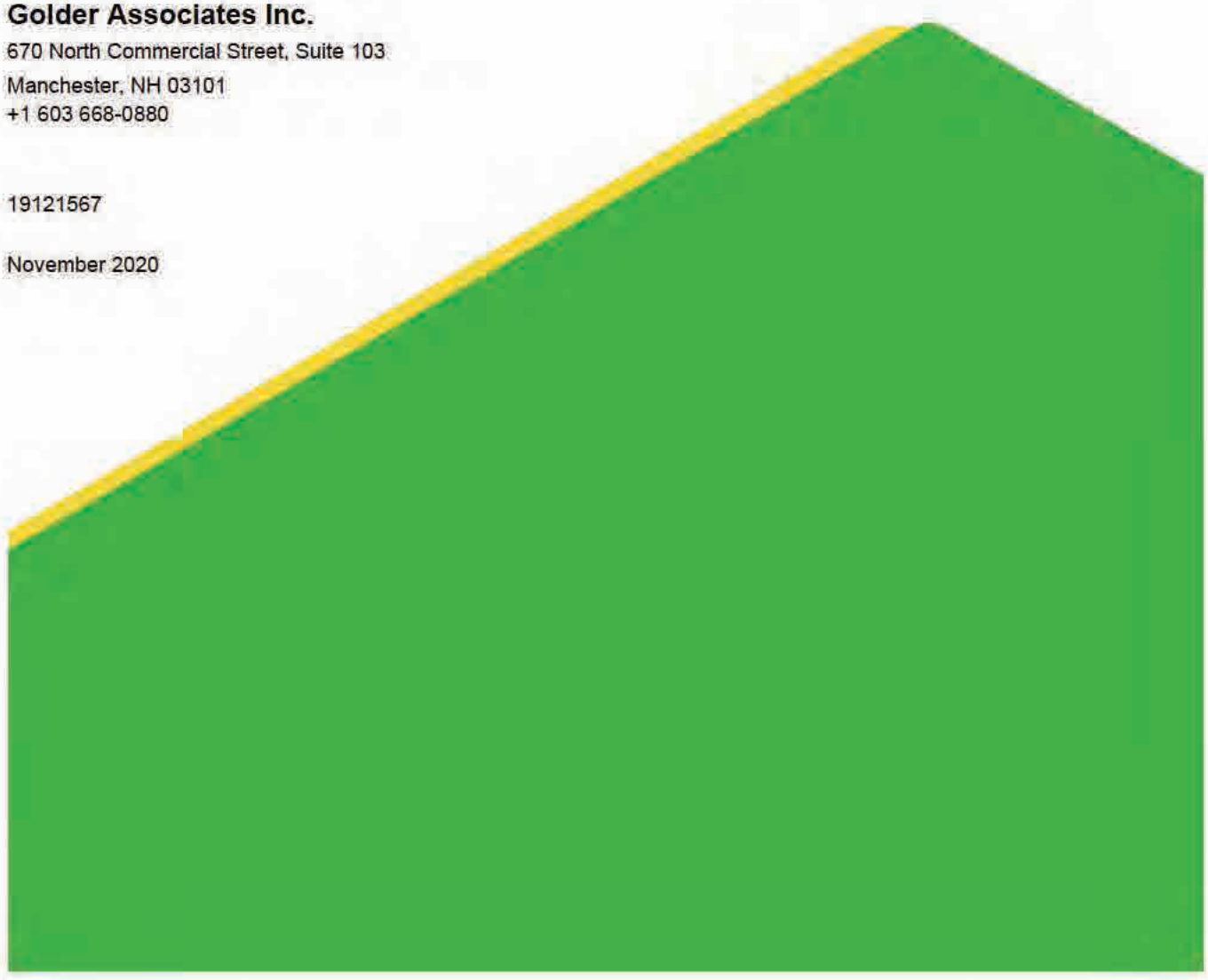


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APPENDICES

APPENDIX A
Groundwater and Porewater Monitoring Data

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Groundwater Flow Model Technical Memorandum

Acronyms

ACM	Assessment of Corrective Measures
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
DO	Dissolved Oxygen
Eh	Reduction Potential
ft bgs	feet below ground surface
g	Gram
GMPIM	Groundwater Monitoring Program Implementation Manual
GWPS	Groundwater Protection Standards
IAP	Ion Activity Product
IDEM	Indiana Department of Environmental Management
ITRC	Interstate Technology Regulatory Council
kg	kilogram
Ksp	Solubility Product
MCL	Maximum Contaminant Level
MCWB	Metal Cleaning Waste Basin
mg	milligram
mg/L	milligram per liter
MNA	Monitored Natural Attenuation
mV	millivolt
MSRB	Material Storage Runoff Basin
NIPSCO LLC	Northern Indiana Public Service Company LLC
ORP	Oxidation-Reduction Potential
RMSGS	R. M. Schahfer Generating Station
SCM	surface complexation model
SEP	Sequential Extraction Potential
SI	Saturation Index
SSL	Statistically Significant Level
SU	Standard Unit
TAL	Target Analyte List
TDS	Total Dissolved Solids
USEPA	United States Environmental Protection Agency
XRD	X-ray diffraction

1.0 OVERVIEW

Groundwater and solid materials were evaluated to determine the feasibility of Monitored Natural Attenuation (MNA) as part of the assessment of corrective measures process for the Coal Combustion Residuals (CCR) surface impoundments (i.e., Material Storage Runoff Basin (MSRB), Metal Cleaning Waste Basin (MCWB), and the Drying Area (together, the CCR Unit) at the Northern Indiana Public Service Company LLC (NIPSCO LLC) Rollin M. Schahfer Generating Station (RMSGS, or Site). The structure of this feasibility evaluation closely follows the United States Environmental Protection Agency (USEPA) guidance on using MNA as a remedial strategy (USEPA 2007a and 2007b) and considers best practices from the Interstate Technology Regulatory Council (ITRC) document: “A Decision Framework for Applying Monitored Natural Attenuation Processes to Metals and Radionuclides in Groundwater” (ITRC 2010).

RMSGS manages CCR in the surface impoundments subject to applicable requirements of 40 Code of Federal Regulations (CFR) Part 257 as amended (CCR Rule). In April 2019, pursuant to 40 CFR §257.96(a), an assessment of corrective measures (ACM) was completed for the CCR Unit. This evaluation identified MNA as a potential remedial alternative for cobalt due to a detection at a Statistically Significant Level (SSL) in groundwater. Additionally, arsenic, boron, lithium, and molybdenum were evaluated as part of this assessment due to the potential for future SSLs, should they ever occur. The results of the evaluation will be used to assess the performance and reliability of MNA as a potential remedial alternative as required by 40 CFR §257.97, Golder determined the overall feasibility of MNA for the CCR Unit by evaluating the following tiers (USEPA 2007a,b):

1) Demonstrate active constituent removal from groundwater and dissolved plume stability (Tier I)

2) Determine the mechanisms and rates of the operative attenuation processes (Tier II)

3) Determine the long-term capacity for attenuation and the stability of immobilized constituents (Tier III)

Following completion of this multi-tier evaluation, the fourth and final tier of an MNA program, which involves the design of a performance monitoring program and the development of a contingency plan, will be developed.

2.0 APPROACH

Golder evaluated the feasibility, mechanisms, rates, and stability of MNA as a remedy for groundwater impacts from the CCR Unit. In order to perform the evaluation, Golder collected samples of groundwater and overburden soil between July 24, 2018 and March 3, 2020 for geochemical analysis. The supplemental MNA assessment included the following activities:

- Groundwater:
  - Characterization to identify temporal and geographical trends, where present, and to estimate site-wide attenuation rates using temporal and spatial trends in groundwater quality data.
  - Geochemical modeling to identify the major chemical species and evaluate saturation indices of minerals relevant to attenuation of arsenic, boron, cobalt, lithium, and molybdenum.
  - Determination of the capacity of different mechanisms to attenuate arsenic, boron, cobalt, lithium, and molybdenum, including adsorption, precipitation and co-precipitation, and physical attenuation (dilution/dispersion).
  - Geochemical modeling to assess the stability and reversibility of attenuation due to adsorption.

- Overburden soil:
  - Mineralogical analysis of overburden soils to identify and quantify the major mineral components.
  - Chemical analysis of overburden soils to quantify the total metal content and identify the environmentally-available fraction of metals.

The results generated by this supplemental assessment were used by Golder to complete the Tier I, Tier II, and Tier III evaluation (USEPA 2007a,b). In addition, groundwater data collected during previous sampling events were used. The results of the Tier I, Tier II, and Tier III are described in the subsequent sections to establish a basis for the likely success of MNA at the RMSGS site.

2.1 Groundwater and Porewater Sampling

2.1.1 Sample Collection

Golder personnel collected groundwater and porewater samples in accordance with the Golder RMSGS Groundwater Monitoring Program Implementation Manual (GMPIM, Golder 2017) from the background, downgradient, Assessment, and property boundary monitoring wells presented in Table 1, and from piezometers located within the CCR Unit. Piezometer GAPIEZ-06 is located interior of the slurry wall on the western edge of the MSRB and is screened within the CCR materials. Piezometers DAPZ-02A and DAPZ-02B (abandoned in April 2020) were installed interior of the slurry wall on the eastern edge of the Drying Area and were screened in native materials (i.e., below the extent of CCR) from approximately five to 20 feet below ground surface (ft bgs) and 33 to 38 ft bgs, respectively. The monitoring well and former piezometer locations are shown in Figure 1.

Table 1: Overview of the Wells Used in the Monitored Natural Attenuation Assessment

Background Wells	Downgradient Wells	Assessment Wells	Property Boundary Wells
GAMW-04, GAMW-07, GAMW-07B, GAMW-15, GAMW-15B	GAMW-08, GAMW-08B, GAMW-09, GAMW-09B, GAMW-16, GAMW-16B, GAMW-17, GAMW-17B, GAMW-18, GAMW-18B	GAMW-52, GAMW-52B, GAMW-53, GAMW-53B, GAMW-54, GAMW-54B, GAMW-55/55R, GAMW-55B, GAMW-56, GAMW-56B	GAMW-46, GAMW-46B

2.1.2 Groundwater and Porewater Analysis

The geochemical characterization of porewater and groundwater samples included the measurement of field parameters and the laboratory analysis of samples for total metals and major cations and anions. The field parameters and laboratory analyses included:

Field Parameters: Parameters measured in the field included pH, dissolved oxygen (DO), oxidation reduction potential (ORP), conductivity, and temperature. These measurements were used to determine general geochemical conditions in the groundwater and support geochemical modeling.

Metals: Analysis of Appendix III and IV metals concentrations was conducted to understand the geochemical composition of groundwater and porewater. Metals analysis allows for the delineation of a potential plume, evaluation of mineral saturation indices, development of partitioning coefficients (in conjunction with solid material analyses), and evaluation of background contributions from natural sources or anthropogenic sources.

Major Cations and Anions: Geochemical modeling of mineral solubility, metals attenuation and background contributions requires analysis of major cations and anions because they affect and participate in sorption and mineral dissolution or precipitation reactions.

The groundwater and porewater samples were analyzed using the following methods:

- pH following SW846 9040C “pH Electrometric Measurement” (USEPA 2004)
- Total dissolved solids standard method (SM) 2540C “Total Dissolved Solids Dried at 180°C” (USEPA 1993a)
- Total hardness following SM 2340B (USEPA 1997)
- Chloride, fluoride, and sulfide following USEPA SW846 9056A “Determination of Inorganic Anions by Ion Chromatography”, Revision 1 (USEPA 2007c)
- Nitrate and nitrite following USEPA 353.2 “Determination of Nitrate-Nitrite Nitrogen by Automated Colorimetry, Revision 2.0” (USEPA 1993b)
- Alkalinity following SM 2320B “Alkalinity by Titration” (USEPA 2005a)
- Phosphorous following SM 4500-P E “Phosphorous by Ascorbic Acid Method” (USEPA 2005b)
- Total Target Analyte List (TAL) metals following USEPA SW846 6010C “Inductively Coupled Plasma-Atomic Emission Spectrometry”, Revision 3, SW846 6020B “Inductively Coupled Plasma-Mass Spectrometry”, Revision 2, and SW846 6020A “Inductively Coupled Plasma-Mass Spectrometry”, Revision 1 (USEPA 1998a)

2.2 Overburden Soil Sampling and Analysis

2.2.1 Sample Collection

Golder subcontracted a licensed well driller to advance borings into the overburden soil and install monitoring wells using roto sonic drilling methods. During boring operations, the driller collected continuous drill cores from all deep wells (i.e.” B” flagged wells). From the drill cores, Golder staff collected overburden samples from the depth of the screened intervals (i.e. 10-foot screened interval) from one background well soil boring (SB-07B), two downgradient well soil borings (SB-08B and SB-18B) and from five Assessment Monitoring well soil borings (SB-52B, SB-53B, SB-54B, SB-55B, and SB-56B). Golder staff also collected an additional sample from SB-53B (25’-27’) at the top of the screened interval due to minor unidentified visual soil staining encountered within the planned interval itself. An additional soil boring was completed just external to the slurry wall on the eastern side of the MCWB (OW-9) and samples were collected on approximately 10-foot intervals.

The driller used a “marsh buggy” with a hollow stem auger drill rig specifically designed to work in the wet, soft soil/ash conditions inside the CCR Unit to advance eight soil borings within the Drying Area. From these eight borings, 23 samples were analyzed for total metals with one of these samples (DA-14_4-6’) also analyzed using the 7-step sequential extraction. The only sample for which data are included in this report is DA-14_4-6’; all other data, which were obtained for other purposes, are provided in the Ash Pond Assessment Report (Golder 2020).

Soil borings were numbered to match the equivalent monitoring wells, where applicable. Golder field staff prepared a composite overburden sample from boreholes by selecting a two-foot interval from each drill core and submitting it to the laboratory for analysis under chain-of-custody procedures. The unique descriptions used to

identify the samples included the boring name and depth of the sample below ground surface (e.g., SB-07B-35'-37'). The sample type and analytical testing conducted on each sample are provided in Table 2.

Table 2: Summary of Overburden Soil Samples/Analyses

Sample Location	Number of Samples	Analyses
Background boring (SB-07B) 35'-37'	1	Total metals, sequential extraction
Downgradient boring (SB-08B) 30'-32'	1	Total metals, sequential extraction
Downgradient boring (SB-18B) 32'-34'	1	Total metals, sequential extraction
Assessment boring (SB-52B) 35'-37'	1	Total metals, sequential extraction, mineralogical composition
Assessment boring (SB-53B) 25'-27' & 30'-32'	2	Total metals, sequential extraction
Assessment boring (SB-54B) 30'-32'	1	Total metals, sequential extraction, mineralogical composition
Assessment boring (SB-55B) 30'-32'	1	Total metals, sequential extraction
Assessment boring (SB-56B) 30'-32'	1	Total metals, sequential extraction, mineralogical composition
Downgradient boring (OW-9) 10'-12' & 18'-20'	2	Total metals, sequential extraction, mineralogical composition
Drying area boring (DA-14) 4'-6'	1	Total metals, sequential extraction

2.2.2 Overburden Soil Analyses

Multiple geochemical methods were used to assess the mineralogical and chemical composition of the overburden soil samples. The selected geochemical test methods included the following:

- **Mineralogical composition:** The mineralogical analysis was used to identify and quantify the crystalline mineral phases in each sample. This information is required for geochemical modeling as the release or attenuation of constituents of interest is influenced by the mineral phase(s) present in the aquifer (Hem 1985). The mineralogical testing laboratory (SGS Minerals Services) performed the mineralogical analysis using quantitative (Rietveld) X-ray diffraction (XRD) and a Bruker AXS D8 Advance Diffractometer.
- **Total metals:** This analysis was used to quantify the chemical composition of overburden soils. The total mass of metals, in combination with the results of sequential extraction testing, can be used to determine the provenance of metals and verify sequential extraction results. The laboratory analyzed a target analyte list of

metals following the methods USEPA SW846 6010C “Inductively Coupled Plasma-Atomic Emission Spectrometry”, Revision 3 (November 2000) and USEPA SW846 7471B “Mercury in Solid or Semisolid Wastes (Manual Cold-Vapor Technique)”, Revision 2.

- **Sequential extraction:** The sequential extraction procedure (SEP) consisted of a seven-step procedure to extract metals from solids, as per Tessier et al. (1979), to identify the provenance of constituents of interest (i.e. the operationally-defined fraction that contains the metal)[1] and determine their potential environmental mobility. For instance, metals bound in the carbonate fraction, or that are exchangeable, are much more likely to become mobile due to changes in groundwater conditions than metals bound within a sulfide or silicate fraction. The summed concentration of a metal measured from all seven steps (SEP SUM) can be compared to the concentration determined from a total metals analysis (SEP Total) for compositional accountability. The laboratory analyzed the metals content of the extracted samples using the method USEPA SW846 6020B “Inductively Coupled Plasma-Mass Spectrometry”, Revision 2 (July 2014).

2.3 Groundwater Assessment Monitoring

Following the installation of a groundwater monitoring system in 2016 and throughout calendar year 2017, Golder collected background groundwater samples and performed Detection Monitoring around the CCR Unit pursuant to the requirements of 40 CFR §257.94. In 2018, Golder performed the first and second Assessment Monitoring sampling events pursuant to the requirements of 40 CFR §257.95. Following the first Assessment Monitoring sampling event, including verification sampling, the constituents that were detected above the groundwater protection standards (GWPS) at SSLs included:

- Cobalt and Lithium at GAMW-08
- Molybdenum at GAMW-18

The GWPS is the larger value of the Maximum Contaminant Level (MCL) or the unit-specific background concentration for each analyte based on a tolerance/prediction limit statistical procedure. However, USEPA amended the CCR Rule (i.e., Phase 1 Part 1 amendment) and created health-based standards for cobalt, lead, lithium, and molybdenum, constituents that do not have MCLs, as of August 29, 2018. Pursuant to 40 CFR §257.95(h)(2), the health-based standards can be used in place of background levels to calculate the GWPS. Consequently, after the second Assessment Monitoring event (October 2018), cobalt in monitoring well GAMW-08 remained as the only constituent detected at an SSL. Arsenic has never been detected above the GWPS or at an SSL, however, Golder also assessed arsenic as part of this evaluation due to sporadic detections at or above the MCL.

[1] Sequential extraction of metals from overburden samples consisted of seven discrete steps for this investigation:

Step 1 - Exchangeable Phase: This extraction includes trace elements that are revers bly adsorbed to overburden minerals, amorphous solids, and/or organic material by electrostatic forces.

Step 2 - Carbonate Phase: This extraction targets trace elements that are adsorbed or otherwise bound to carbonate minerals.

Step 3 – Non-Crystalline Materials Phase: This extraction targets trace elements that are complexed by amorphous minerals (e.g., iron).

Step 4 - Metal Hydroxide Phase: Trace elements bound to hydroxides of iron, manganese, and/or aluminum.

Step 5 - Organic Phase: This extraction targets trace elements strongly bound via chemisorption to organic material.

Step 6 - Acid/Sulfide Fraction: The extraction is used to identify trace elements precipitated as sulfide minerals.

Step 7 - Residual Fraction: Trace elements remaining in the overburden after the previous extractions will be distributed between silicates, phosphates, and refractory oxides.

Although boron is not currently an Appendix IV constituent, USEPA is reportedly considering adding it to the Appendix IV list. The Indiana Department of Environmental Management (IDEM) has, however, established a health-based standard as part of the state cleanup program. Boron is frequently used as a tracer to indicate the extent of a release from a CCR management unit. Due to these characteristics and as a conservative measure, boron was selected by Golder to assess the nature and extent of groundwater impacts at the Site.

The health-based standards, unit-specific background concentration, and groundwater protection standards used in this evaluation are summarized in Table 3.

Table 3: Summary of Health-Based Standards, Background Concentrations, and Groundwater Protection Standards for the Constituents of Interest

Constituent	Health-Based Standard (mg/L)	Background Concentration (mg/L)	Groundwater Protection Standard (mg/L)
Arsenic	0.01	0.091	0.091
Boron	4(1)		
Cobalt	0.006	0.01	0.01
Lithium	0.04	0.01	0.04
Molybdenum	0.1	0.05	0.1

(1) IDEM health-based standard, not currently part of the CCR Rule

2.4 Groundwater and Porewater Geochemical Analysis

2.4.1 Estimation of Attenuation Rates

To evaluate the attenuation of arsenic, boron, cobalt, lithium, and molybdenum in groundwater at the Site and to assess the rate of attenuation, Golder applied the point decay method (USEPA 2011). The point decay method is used to determine the rate at which a constituent's concentrations are increasing or decreasing in groundwater at a single well between sampling events and this method can thus be used to predict when the constituent's concentrations will fall back below regulatory limits. Equation 1 describes first-order decay for a constituent:

$$Ln(C_t) = kt + Ln(C_0) \qquad \text{(Equation 1)}$$

where C_0 is the initial constituent concentration, C_t is the constituent concentration at time t, t is the amount of time in years that has passed since the initial concentration measurement, and k is the first-order decay rate constant (1 per year). Equation 2 shows Equation 1 reorganized to solve for the decay rate constant:

$$k = (Ln(C_t) - Ln(C_0))/t \qquad \text{(Equation 2)}$$

Groundwater water quality data from the background and downgradient wells collected between July 2016 and November 2019 were used to determine the mean first-order decay rate for each constituent of interest. Due to variable detection limits, results that were reported as below detection limits were not used in the point decay analysis. Using Equation 1 and the mean first-order decay rate, Golder calculated the number of years that it would take for constituents of interest concentrations greater than the GWPS to decrease below their respective thresholds.

2.4.2 Geochemical Speciation Modeling Methods

Golder conducted geochemical modeling to evaluate general groundwater and porewater composition, determine the potential for precipitation of sorbent media, evaluate the potential for mineral precipitation or adsorption in the aquifer, and determine the speciation of metals of interest. The geochemical computer code developed by the United States Geological Survey (USGS), PHREEQC (Parkhurst and Appelo 2013), was used for these simulations. PHREEQC version 3.4 is a general-purpose geochemical modeling code used to simulate reactions in water and between water and solid mineral phases (e.g., rocks and sediments). Reactions include aqueous equilibria, mineral dissolution and precipitation, ion exchange, surface complexation, solid solutions, gas-water equilibrium, and kinetic biogeochemical reactions. The widely-accepted thermodynamic database, Minteq.v4, 2017 edition, was used as a basis for the thermodynamic constants required for modeling (USEPA 1998b).

The Geochemist's Workbench version 12 (Bethke 2015) was used to generate graphical representations of geochemical modeling outputs in the form of predominance, or Pourbaix diagrams (also known as Eh-pH diagrams) for the species of interest (i.e. arsenic, boron, cobalt, lithium, and molybdenum) and trilinear plots (also known as Piper plots) displaying the relative abundance of major ions. The Minteq.v4 database was used as the basis for the Pourbaix diagrams.

2.4.3 Predictive Geochemical Modeling Methods

Golder performed geochemical modeling to assess viable attenuation mechanisms and to predict the quantity and stability of the attenuated constituents of concern.

2.4.3.1 Capacity of Adsorption as an Attenuation Mechanism

Adsorption is an important mechanism by which constituents in groundwater can be attenuated. The adsorptive partitioning between dissolved and solid phases was simulated using a two-layer surface complexation model (SCM). The SCM approach is described in Davis and Kent (1990), with additional parameterization based on Dzombak and Morel (1990) and Karamalidis and Dzombak (2011) utilizing iron (hydrous ferric oxide [Hfo]) as ferrihydrite [$Fe(OH)_{3(am)}$], and aluminum (hydrous aluminum oxide [Hao]) as gibbsite [$Al(OH)_{3(am)}$], as adsorbing surfaces.

The amount of Hfo and Hao available at the site for attenuation was based on the amorphous and metal hydroxide phase iron and aluminum concentrations measured in the SEP as described in Section 3.2.2. The minimum, mean, and maximum concentrations in soil borings were used in the adsorption models to capture the range of expected site concentrations. The Hfo and Hao surface properties (i.e., surface area, site density, and types of sites) from Dzombak and Morel (1990) and Karamalidis and Dzombak (2011) were used to quantify the iron and aluminum adsorption sites per mole of mineral.

The calculation methodology of Appelo and Postma (2010) was used to determine the specific quantity of sites on each mineral surface type as a function of the amount of mineral available to participate in these reactions. The methodology assumes the number of surface sites (sites) equals the product of the moles of iron ([Fe]) and the moles of surface sites per mole of iron ([sites]/[Fe]= 0.2 moles of sites per mole of iron). For the amount of ferrihydrite available for sorption, the Appelo and Postma methodology further assumes the mass of ferrihydrite (M_{HFO}) in grams (g) available equals the product of the [Fe] and the molecular weight of ferrihydrite (MW_{HFO} = 88.85 g/mole). The same approach was used to calculate the number of sites from gibbsite, assuming the [sites]/[Al] is 0.41 moles of sites per mole of aluminum and the molecular weight of gibbsite is 78.003 g/mole.

The geochemical thermodynamic database Minteq V.4 was used to conduct adsorption modeling. However, new and updated thermodynamic data have been released in scientific literature. These new data are important to include in the geochemical modeling exercises for certain elements or minerals as they allow further refinement of potential reactions, or for correction of previous data that may have been less accurate or more broadly defined. For groundwater modeling at the Site, Golder made numerous updates to the Minteq V.4 database, including the addition of data relating to partitioning coefficients for metals on gibbsite, developed by Karamalidis and Dzombak (2011). Of the five constituents of interest, the database did not contain partitioning coefficients for ferrihydrite or gibbsite for lithium, so its potential for adsorption could not be assessed.

To quantify current levels of adsorption, the concentration of constituents that adsorb in soils (as milligram (mg) of constituent/kilogram (kg) of soil) was modeled for the minimum, maximum, and mean Hfo and Hao contents when equilibrated with the range of groundwater qualities observed at the Site. To quantify the capacity of soil to adsorb additional amounts of each constituent, Golder simulated a step-wise increase in arsenic, boron, cobalt, and molybdenum concentrations (similar in concept to a titration, using the mean proportions observed in porewater) into the range of observed groundwater qualities while allowing equilibration with the sorption surfaces in soils (minimum, maximum and mean Hfo and Hao). The model was then used to predict the quantity of each constituent that would adsorb with this titration of additional arsenic, boron, cobalt, and molybdenum.

2.4.3.2 Mineral Precipitation and Co-precipitation

The potential for mineral precipitation was assessed in PHREEQC using a saturation index (SI) calculated according to Equation 3.

$$SI = \log (IAP/Ksp) \quad \text{(Equation 3)}$$

The saturation index is the ratio of the ion activity product (IAP) of a mineral to the solubility product (Ksp). An SI value greater than zero indicates that the solution is supersaturated with respect to a particular mineral phase and, therefore, precipitation of this mineral may occur. An evaluation of precipitation kinetics is then required to determine whether the supersaturated mineral will indeed form. An SI value less than zero indicates the solution is undersaturated with respect to a particular mineral phase. An SI value close to zero indicates equilibrium conditions exist between the mineral and the solution. SI values between -0.5 and 0.5 are considered to represent ‘equilibrium’ in this report to account for the uncertainties inherent in the analytical methods and geochemical modeling.

Co-precipitation was evaluated based on published literature and known association between minerals and constituents of concern. For example, cobalt is known to coprecipitate with iron oxyhydroxides as well as adsorb to Hfo (Norstrom and Alpers 1999). Therefore, to evaluate co-precipitation, minerals identified by PHREEQC to be at equilibrium (SI > -0.5) were evaluated for their potential to host arsenic, boron, cobalt, lithium, and molybdenum.

2.4.3.3 Capacity of Dilution and Dispersion as Attenuation Mechanisms

Dilution and dispersion are physical mechanisms of attenuation by which concentrations of constituents in groundwater decrease with migration along groundwater flowpaths.

To assess the potential for dilution and dispersion downgradient of the CCR Unit, Golder used MODPATH (Pollack 1989) and the calibrated Site Groundwater Flow model (discussed in Section 4.0 and Appendix B) to simulate travel times for particles released from the MCWB. The length of the particle traces produced by

MODPATH along with travel time estimates were used to calculate average groundwater velocities for the following flow paths: (see Figure 1):

- GAMW-16 to GAMW-53
- GAMW-18 to GAMW-55
- GAMW-17 to GAMW-54
- GAMW-09 to GAMW-54

The results of these flow path travel time simulations are presented in Table 4.

Golder estimated the capacity of dilution and dispersion to attenuate constituent concentrations from the CCR Unit using ratios of concentrations measured in monitoring wells along these flow paths, as presented in Table 8. For example, along the flow path from GAMW-16 to GAMW-53, concentrations of boron decreased from 9.7 milligram per liter (mg/L) to 3.1 mg/L, representing an estimated 68% decrease in concentration along the flow path due to dilution and attenuation.

2.4.3.4 Long Term Stability of Attenuated Constituents

Three sensitivity analyses were performed to assess the stability of adsorbed constituents under variable pH, redox, and ionic strength conditions. Variations in pH, redox, and ionic strength are the most likely types of changes that will occur in an aquifer over time affecting the stability of the constituents of interest (ITRC 2010). The sensitivity analyses were conducted applying the minimum, mean, and maximum Hfo and Hao contents determined for the Site soils, equilibrated with the groundwater qualities observed at the Site at the measured pH and redox conditions. For each sensitivity analysis, a single parameter was varied:

- **pH -** Hydrochloric acid or sodium hydroxide addition was modeled to vary the pH between 4 and 12 standard units (SU). A pH range of 4 to 10 is the typical range considered for evaluating metal speciation.
- **Redox -** DO addition was simulated to adjust reduction potential (Eh) values between -200 and +700 millivolts (mV) based on the historical and anticipated range of Eh in the region.
- **Ionic Strength -** Total dissolved solids (TDS) concentrations were increased by titrating in calcium, magnesium, sodium, potassium, chloride, and sulfate in the proportions observed in porewater. TDS concentrations were evaluated up to 10,000 mg/L, which is approximately four times higher than the highest TDS concentration observed in groundwater at the CCR Unit.

2.4.4 Geochemical Modeling Assumptions and Data Handling

Geochemical modeling assumptions and data handling included the following:

- **Groundwater continuity:** Three or four groundwater quality samples were collected from each well during sampling events conducted between September 2018 and November 2019. Samples from this period were selected for the geochemical modeling because all wells related to the CCR Unit were sampled and analyzed for the full suite of parameters described in Section 2.1.2 and the resulting data are assumed to provide a comprehensive overview of groundwater conditions. Temporal trend analysis for arsenic, boron, cobalt, lithium, and molybdenum made use of all available sampling events between July 2016 and November 2019.

- **Porewater chemistry:** Porewater samples collected from GAPIEZ-06 (three samples total in August, September, and October 2018), DAPZ-02A (one sample collected in March 2020), and DAPZ-02B (one sample collected in March 2020) were assumed to be representative of porewater found in the CCR Unit. Data from three sampling events from GAPIEZ-06 were used to evaluate porewater trends.
- **Redox values:** ORP values measured in the field were converted to Eh by adding 200 mV to the field-measured values as per YSI Tech Note (YSI 2015).
- **Non-detect values:** Constituents with concentrations less than their respective method reporting limits were assumed to have a concentration equal to half the reporting limit in model simulations.
- **Total recoverable concentrations:** Total recoverable fraction results were used for geochemical modeling.
- **Charge balance:** Groundwater and porewater compositions with charge balance errors less than 10% were considered valid. Compositions with charge balance errors greater than 10% were flagged as potentially less reliable, but still included in the geochemical modeling effort.

3.0 SUPPLEMENTAL ASSESSMENT RESULTS

3.1 Groundwater and Porewater

3.1.1 Groundwater Characterization

Groundwater quality data for background, downgradient, and Assessment Monitoring wells used for this evaluation were collected from September 2016 to November 2019. Non-regulated (per the CCR Rule) groundwater parameters (e.g., alkalinity, potassium, sodium) are only available from September 2018 to November 2019. The assessment of trends in arsenic, boron, cobalt, lithium, and molybdenum concentrations in groundwater included observations of all validated data collected during that time frame. Groundwater quality monitoring data are presented in Appendix A and can be summarized as follows:

- **Charge balance error:** Charge balance errors could only be assessed for samples for which the full suite of cations and anions was reported. Eleven groundwater samples had charge balance errors greater than 10%. Eight out of the eleven samples (GAMW-07 in November 2019, GAMW-07B in November 2019, GAMW-08B October 2018, GAMW-08B in November 2019, GAMW-18 in October 2018, GAMW-18B in October 2018, GAMW-18B in November 2019 and GAMW-56B in April 2019) reported charge balance errors between 10% and 15%. Only samples from GAMW-07B in September 2018, GAMW-18B in April 2019, and GAMW-56 in April 2019 had a charge balance error greater than 40%. All eleven results were flagged (Table 5) and retained, with the understanding that they may be somewhat less reliable. Upon subsequent sampling, charges balance errors decreased to <10 % in these wells.
- **pH:** Groundwater pH across background, downgradient, and Assessment Monitoring wells ranged from 5.2 to 8.7. The geometric mean pH across all wells was 7.2. GAMW-07B, GAMW-52B, GAMW-54B were the only wells that produced samples with a pH exceeding 8.0.
- **ORP (Redox):** Field-measured redox, corrected to Eh (+200 millivolts [mV]) values, ranged from -115 to +335 mV in the background monitoring well, downgradient monitoring well, Assessment Monitoring well, and porewater samples collected between September 2018 to November 2019. There was no apparent trend in redox conditions based on sample location or depth.

- **Total Dissolved Solids:** Groundwater TDS concentrations were variable. Generally, the lowest TDS concentrations (less than 400 mg/L) were measured in groundwater at Assessment Monitoring wells (GAMW-46, GAMW-46B, GAMW-52, GAMW-53) while TDS concentrations up to an order of magnitude higher were determined in groundwater at wells located immediately downgradient of the CCR Unit (e.g., GAMW-08B). In general, deep wells demonstrated higher TDS concentrations than shallower companion wells at the same locations.

- **Major ion chemistry:** A Piper plot was generated for all porewater samples and groundwater samples from background, downgradient, and Assessment Monitoring wells to facilitate the identification of water types and changes in major ion chemistry over time (Figure 2a-c). The majority of background, downgradient, and porewater samples are calcium-sulfate dominated. In general, deep wells have a higher proportion of sodium and sulfate than the shallower companion wells. The differences between shallow and deep companion wells are more pronounced in the Assessment Monitoring wells. Except for GAMW-54 and GAMW-55, the shallow samples from the assessment wells are calcium-(bi)carbonate dominated and plot in a different location on the Piper plot than background, downgradient, and porewater samples. Shallow wells GAMW-54 and GAMW-55, along with all the deep Assessment Monitoring wells, are calcium-sulfate dominated and plot with background, downgradient, and porewater samples. The water types have remained generally unchanged between September 2018 and November 2019. Generally, this indicates that groundwater types are consistent. However, based on major ion chemistry, there are different water types on the site that are likely influenced by variable site geology.

- **Arsenic:** Arsenic concentrations in groundwater samples collected from downgradient monitoring and Assessment Monitoring wells between September 2016 to November 2019 ranged from non-detect (<0.005 mg/L) to 0.022 mg/L (Figure 4a-c). The highest measured arsenic concentration in groundwater at the CCR Unit (0.091 mg/L) was reported in a sample collected from background well GAMW-15 in September 2018 (Figure 4a). No downgradient monitoring well has ever exceeded the GWPS of 0.091 mg/L designated for the CCR Unit. Arsenic concentrations in groundwater appear to be stable or decreasing in all downgradient monitoring wells (Figure 4b). Arsenic concentrations in the CCR Unit porewater (GAPIEZ-06) ranged from 0.011 to 0.012 mg/L in August and October 2018 (Appendix A-2). Arsenic concentrations collected from the Drying Area in March 2020 (DAPZ-02A and DAPZ-02B) were an order of magnitude lower (<0.0010 and 0.0018 mg/L, respectively). Based on the observed pH and Eh conditions, arsenic predominately occurs as an oxidized arsenate (As^{+5}) species, with arsenic in only a small number of samples present as a reduced arsenite (As^{+3}) species (Figure 3a). Arsenite is less readily adsorbed than arsenate and is thus generally regarded to be more mobile in natural environments (Nordstrom 2014).

- **Boron:** Boron concentrations in downgradient groundwater samples collected between September 2016 to November 2019 ranged from 0.056 mg/L to 25 mg/L (Figure 5a-c). The highest boron concentration (25 mg/L) was measured in monitoring well GAMW-09B in September 2017. Two background wells (GAMW-07B and GAMW-15B), seven downgradient wells (GAMW-08B, GAMW-09, GAMW-09B, GAMW-16B, GAMW-17, GAMW-17B, and GAMW-18B) and two Assessment Monitoring wells (GAMW-54B and GAMW-55B) reported boron concentrations greater than the health-based standards (4 mg/L). Boron concentrations in porewater were between 7.4 mg/L and 13.8 mg/L. Based on pH conditions on the Site, boron in all wells occurs predominately in the form of protonated boric acid (H_3BO_3) (Figure 3b). Generally, boron concentrations in the background and downgradient wells have remained stable or has decreased. This is also the case for all assessment and boundary well except for GAMW-55B, where boron has increased slightly. GAMW-55B is a deep well and heavily influenced by bedrock.

- **Cobalt:** Cobalt concentrations ranged from non-detect (<0.001 mg/L) to 0.059 mg/L in groundwater samples collected between September 2016 to November 2019 at the CCR Unit (Figure 6a-c). GAMW-08 had the highest cobalt concentration of all monitoring wells (0.059 mg/L in November 2016) and generally reported a decreasing trend thereafter (Figure 6b). The second highest concentration (0.010 mg/L in June 2017 and October 2018) occurred in GAMW-07, a background well (Figure 6a). GAMW-08 is the only well on Site to have reported a historic cobalt level greater than the GWPS (0.010 mg/L). Cobalt in porewater ranged from below the laboratory reporting limit (<0.0010 mg/L) to 0.0022 mg/L. Cobalt in all wells occurs predominately as the divalent cation Co^{+2}, based on pH and Eh conditions (Figure 3c). Cobalt concentrations appear to be stable or decreasing in groundwater samples collected from the upgradient, downgradient, and Assessment Monitoring wells.
- **Lithium:** Lithium concentrations in groundwater ranged from non-detect (<0.008 mg/L) to 0.025 mg/L between September 2016 to November 2019 (Figure 7a-c). Two downgradient wells, GAMW-18B and GAMW-08, located directly downgradient of the MCWB, have historically had the highest lithium concentrations (Figure 7b). Lithium concentrations historically have not exceeded 0.040 mg/L, the health-based standard. Lithium levels in GAMW-08 appear generally consistent over time, and a trend cannot be determined for GAMW-18B, as the well was recently installed and fewer than four sampling events have been conducted. Lithium concentrations in groundwater at all other wells downgradient of the CCR Unit appear to be stable. Lithium was not detected above the laboratory reporting limit (0.008 mg/L) in the CCR Unit porewater (GAPIEZ-06). Lithium concentrations collected from the Drying Area in March 2020 (DAPZ-02A and DAPZ-02B) were <0.008 mg/L and 0.016 mg/L, respectively. Lithium predominately occurs as the monovalent cationic species Li^{+} based on field pH and Eh conditions (Figure 3d).
- **Molybdenum:** Molybdenum concentrations in groundwater ranged from non-detect (<0.010 mg/L) to 0.18 mg/L (Figure 8a-c). Although GAMW-18 has reported historical levels of up to 0.18 mg/L, concentrations have been below 0.1 mg/L (the health-based standard) since August 2017. No other CCR Unit monitoring wells have reported concentrations exceeding 0.1 mg/L. The molybdenum concentration in porewater has ranged from 0.063 mg/L to 0.81 mg/L. Molybdenum is predominately present in the form of the divalent anionic molybdate (MoO_4^{-2}) species based on field-measured pH and Eh conditions (Figure 3e).
- **Iron:** Total (un-filtered) iron concentrations were variable, ranging from non-detect (<0.1 mg/L) to 13 mg/L between September 2018 and November 2019 (Appendix A-1). The highest concentration of 13 mg/L was observed in the groundwater sample collected from Assessment Monitoring well GAMW-56. No geographical trend is apparent; however, deeper “B wells” generally tended to have higher total iron contents. Ferric iron (Fe^{+3}) concentrations were higher than ferrous iron (Fe^{+2}) concentrations in all samples, except for those collected from wells GAMW-15, GAMW-55B, and GAMW-56.
- **Nutrients:** Total nitrogen (nitrate + nitrite) was measured in groundwater samples collected in October 2018 and was present at low levels (i.e. less than 2.8 mg/L). Nitrate concentrations were measured in samples collected in 2019 and concentrations ranged from below the detection limit (<0.05 mg/L) to 7.7 mg/L. The highest reported nitrate concentration was found in GAMW-08 in May 2019 (7.7 mg/L-N). The presence of low-level nitrate confirms oxidized conditions surround the CCR Unit. Phosphate concentrations exceeding 1 mg/L were detected in groundwater samples from GAMW-15 and GAMW-16. Phosphate concentrations were below detection in groundwater samples collected from 18 of the 25 wells between September 2018 and November 2019. No geographical or temporal trend is apparent in the phosphate concentrations related to the CCR Unit (Appendix A).

The monitoring data also indicate that sulfate generally occurs at the highest concentrations immediately downgradient of the CCR Unit and in background monitoring wells (Figure 9a-c). As identified in Figure 2a-c, considering major groundwater chemistry and sulfate, the CCR Unit is likely influencing groundwater quality in Assessment Monitoring wells GAMW-54/54B and GAMW-55/55B. However, while affected by the CCR Unit, these wells report low concentrations of arsenic, cobalt, lithium, and molybdenum below health-based standards or below detection limits. Boron concentrations were elevated above its GWPS in both upgradient and downgradient wells, suggesting elevated concentrations are naturally occurring or due to an alternate source at the Site.

3.1.2 Evaluation of Attenuation Rates

The results of the point decay analysis for groundwater at background and downgradient wells (including Assessment Monitoring wells) between September 2016 and November 2019 are provided in Table 6, as mean site attenuation rates. This evaluation reveals that, despite concentrations generally increasing in background wells over time (as indicated by positive point decay constants), boron, cobalt, lithium, and molybdenum concentrations in downgradient wells have decreased (negative point decay constants) over that same monitoring period. The mean downgradient decay rates can be used to estimate the number of years it would take for elevated groundwater concentrations to decrease to the GWPS. Maximum concentrations of boron, cobalt and molybdenum observed in downgradient monitoring wells over the period of monitoring would take approximately 41 years, 39 years, and 20 years, respectively, to attenuate to concentrations below GWPS (or health-based standard for boron) based on these decay rates. The durations required to achieve regulatory standards for arsenic and lithium were not calculated because there are no exceedances of the GWPS for these constituents.

The positive mean point decay rate for arsenic in downgradient monitoring wells indicates that, on average, concentrations are increasing. Given the low concentrations in the porewater samples (≤ 0.012 mg/L), this trend is unlikely to be caused by the CCR Unit. Low-level increasing arsenic concentrations in Assessment Monitoring wells GAMW-52B, GAMW-53B, GAMW-54, and GAMW-54B are driving the positive point decay rate, but the arsenic concentrations in these wells remain sufficiently low (≤ 0.005 mg/L) and are likely caused by natural variability. Although an increasing trend of arsenic at these wells currently may exist, it is unlikely this trend will continue given the potential for attenuation (e.g., through sorption and dilution) to maintain arsenic concentrations below the GWPS.

3.1.3 Mineralogical Controls in Groundwater and Porewater

The results of speciation modeling of groundwater data from background, downgradient, and Assessment Monitoring wells between September 2018 and November 2019 are provided in Table 5, including saturation indices for relevant minerals. Mineral saturation can play an important role in attenuation of metals, either directly by their removal through mineral precipitation, or indirectly by providing sorptive surfaces or opportunities for co-precipitation.

- **Iron-bearing minerals:** Ferrihydrite was indicated to be at equilibrium with groundwater or oversaturated in nearly all samples, indicating a strong potential for ongoing precipitation of solid-phase iron oxides. Only two samples from Assessment Monitoring well GAMW-53 (April 2019 and November 2019) were modeled to be undersaturated with respect to ferrihydrite. Thus, it is assumed that iron (hydr)oxides are prevalent in the Site aquifers.
- **Other minerals:** Nearly all groundwater samples, with the exception of samples from GAMW-07 and GAMW-52, were simulated to be in equilibrium or oversaturated with respect to barite ($BaSO_4$). Fluorite

(CaF_2) equilibrium was indicated in wells GAMW-07B, GAMW-08/08B, GAMW-17, and GAMW-52B. Gypsum ($CaSO_4.2H_2O$) was modeled to be in equilibrium in seven wells (GAMW-07B, GAMW-08B, GAMW-15B, GAMW-16B, GAMW-18, GAMW-18B, and GAMW-55B), most of which were deeper "B-wells" nearer to bedrock. Calcite ($CaCO_3$) equilibrium was indicated in all wells except GAMW-53.

In summary, several mineral phases likely control groundwater composition at some or all wells: barite, calcite, fluorite, ferrihydrite, and gypsum. In the case of ferrihydrite, the dissolved concentrations of constituents of interest can be reduced through its ability to act as a substrate for adsorption.

3.2 Overburden Soil

3.2.1 Mineralogical Composition

Quantitative XRD with Rietveld refinement was used to identify and quantify minerals in five overburden soil samples collected during the drilling activities (Table 7). Three of the samples were collected from the Assessment Monitoring well's soil borings and two samples were collected from the downgradient soil boring (OW-9). These samples were obtained to better understand the mineralogical composition of the aquifer system and identify any minerals that would potentially influence attenuation of constituents of interest. In addition, and in contrast, the presence of certain minerals could also indicate a potential for naturally occurring release of metals into groundwater, for instance due to oxidation of sulfide minerals.

The mineralogical analysis identified the iron sulfide minerals pyrite and marcasite at low levels in three of the five overburden soil samples, at concentrations up to 0.6 wt.%. These minerals can oxidize in the presence of even trace amounts of dissolved oxygen, which would lead to the liberation of trace metals or metalloids known to associate with sulfide minerals (e.g., arsenic, cobalt, and molybdenum) into groundwater (Smith and Huyck 1997). In addition, the associated release of iron creates the potential for formation of minerals with the ability to sorb trace elements.

The presence of the oxidized iron mineral hematite (Fe_2O_3) at 0.3 to 0.6 wt.% in three of the five overburden soil samples in the presence of reduced iron sulfide minerals indicates a spectrum of oxidation occurring in overburden soil samples. As pyrite or marcasite is oxidized, intermediate amorphous iron phases, such as ferrihydrite, would likely occur first. Over time, crystallization would progress, forming iron oxide-oxyhydroxides such as hematite or goethite (FeOOH). Therefore, it is likely a range of iron solid phases is present in the overburden soil, and the potential exists over time for an increased presence of amorphous and crystallized iron oxides-oxyhydroxides with a strong affinity to attenuate certain metals and metalloids (Dzombak and Morel 1990).

The mineralogical analysis also identified the carbonate minerals calcite ($CaCO_3$) and dolomite ($CaMg(CO_3)_2$) in all overburden soil samples, with combined concentrations between 9 and 16 wt.%. Carbonate minerals are known to adsorb cobalt (Brady et al. 2003) while sorption and uptake of arsenic are possible as well (e.g., Romero et al. 2004). Carbonate minerals can dissolve when exposed to sulfuric acid formed by oxidation of sulfide minerals and release associated trace metals and metalloids (Section 3.2.2) into groundwater. Iron can also be released as carbonate minerals dissolve and potentially form metal hydroxide minerals.

3.2.2 Chemical Composition and Sequential Extraction

Chemical analysis and sequential extraction were conducted to determine the chemical composition and the distribution of constituents of interest over various operationally defined fractions of the overburden soil. This testing was completed per Table 2 on nine overburden soil samples from eight monitoring well locations, two samples from the OW-9 borehole, and one sample from within the Drying Area (reported in Table 8). Soil samples

from soil borings that correspond to well locations were collected from within the screened depth (except SB-53B 25'-27' which was collected above the screened depth).

A description of the individual fractions determined by sequential extraction is presented in Section 2.2.2, footnote 1. Metals extracted in steps 1 through 5 are considered environmentally available, whereas metals extracted in steps 6 and 7 are present in refractory fractions and are not expected to be released under conditions typically encountered in aquifers (Tessier et al. 1979). The sum of metal concentrations from the sequential extraction steps is expressed as "SEP SUM" in Table 8 and does not represent an analytically determined value. The concentration measured by total metals analysis is referred to as "SEP Total" in Table 8. Boron was not included in the SEP analysis due to method limitations.

The results from the chemical analysis and sequential extraction can be summarized as follows:

- **Iron:** Iron was present in all twelve samples analyzed, varying from 3,400 milligram per kilogram (mg/kg) (DA-14) to 9,900 mg/kg (SB-54B). In all samples, the refractory sulfide and residual fractions accounted for the largest proportion of total iron and, as such, most of the iron is not environmentally available (Figure 10). The labile fraction in steps 1 through 5 can generally be considered representative of the amount of iron in the overburden that may be available as a sorbing medium. While not a constituent of interest, iron and its minerals commonly represent the most important reservoir for metal/metalloid attenuation in soils or overburden. The labile fraction calculated from sequential extraction, therefore, can be used as a proxy for determining the total number of adsorption sites available for attenuation of arsenic, boron, cobalt, and molybdenum in the environment.
- **Arsenic:** Total arsenic in the soil overburden samples ranged from 1.9 to 6.2 mg/kg while the environmentally-available fraction ranged from 0.44 mg/kg in SB-55B to 3.0 mg/kg in SB-53B, representing from 31% to 59% of total arsenic (Figure 11). The majority of arsenic was present in the refractory fraction, predominantly associated with sulfide minerals. The amorphous metal and metal hydroxide fractions hosted all arsenic that was environmentally available except in SB-52B, where the carbonate fraction represented 8.5% of total arsenic. The highest concentrations of environmentally-available arsenic occurred in sample SB-56B, and the lowest concentrations were encountered in samples DA-14, SB-53B and SB-55B. The Drying Area sample (DA-14) had the second lowest environmentally-available arsenic concentrations (0.45 mg/kg) of all samples analyzed. Arsenic in DA-14 predominantly occurred in the sulfide and insoluble fractions.
- **Cobalt:** Total cobalt in soil borings ranged from 2.5 mg/kg to 6.1 mg/kg while the environmentally-available fraction ranged from 1.1 mg/kg in OW-9 to 2.9 mg/kg in SB-53B, representing from 27% to 60% of total cobalt (Figure 12). Those samples downgradient of the CCR Unit had similar total cobalt in the environmentally-available fraction as the background samples. In all boring samples, cobalt was most abundant in the metal hydroxide, sulfide, and residual fractions. Cobalt was also present in the carbonate phase in the nine soil bore samples (5% to 14% of total). Cobalt in the carbonate phase is most likely sorbed onto or coprecipitated with the calcite that was indicated to be in equilibrium with groundwater in geochemical modeling. Cobalt was not detected in the exchangeable phase. DA-14 reported the lowest total and environmentally-available cobalt concentrations (0.87 mg/L and 0.39 mg/L, respectively) of all samples analyzed, predominantly in the metal hydroxide and sulfide fractions.
- **Lithium:** Total lithium ranged from 4.2 to 11 mg/kg while the environmentally-available fraction ranged from 0.5 mg/kg in DA-14 to 11.4 mg/kg in SB-18B, representing from 12% to 74% of total lithium (Figure 13). The

majority of lithium was present in either the organic or the refractory fraction. The organic, carbonate, and metal hydroxide fractions hosted all lithium that was environmentally available. The highest concentrations of environmentally-available lithium occurred in samples SB-18B, SB-54B, SB-55B and SB-56B, and the lowest amount was encountered in SB-53B. Lithium concentrations in DA-14 were generally lower than in background and downgradient monitoring wells, with the majority of the lithium present in the sulfide and residual fractions.

- **Molybdenum:** Total molybdenum in overburden ranged from 0.15 to 3.8 mg/kg while the environmentally-available fraction ranged from non-detect to 2.83 mg/kg, in SB-53B (25'-27'), and accounted for 100% of all molybdenum in SB-18B and SB-53B (30'-32') (Figure 14). Molybdenum was most commonly present in the amorphous and metal hydroxide fractions. Notably, in background boring SB-07B and in SB-08B, a downgradient boring in close proximity of the CCR Unit, molybdenum was non-detect in overburden soil samples. The soil boring with the highest total molybdenum content, SB-53B, is located further downgradient from the CCR Unit. The Drying Area sample (DA-14) had the highest concentrations (15 mg/kg) of all samples analyzed. Molybdenum in DA-14 was present predominantly in the exchangeable fraction.

In summary, no definitive trends were present for arsenic, cobalt, lithium or molybdenum that indicated a higher concentration immediately downgradient of the CCR Unit relative to background locations or locations further downgradient. Based on the above results, attenuation by adsorption of all four constituents of interest is likely occurring, with the carbonates, amorphous metal oxides, and metal hydroxide fractions accounting for the majority of the attenuation.

4.0 GROUNDWATER MODELING RESULTS

Through standard numerical groundwater modeling procedures, Golder developed a steady state groundwater flow model for the Site that is considered calibrated and verified. Details of the flow model development are presented in Appendix B. This model was utilized to inform the natural attenuation study by simulating travel times for particles released from the MCWB, as presented in Table 4.

5.0 GEOCHEMICAL MODELING RESULTS

5.1 Identification and Capacity of Attenuation Mechanisms

5.1.1 Adsorption to Iron and Aluminum Oxyhydroxides

The Hfo and Hao surface area and sorption site calculations for the minimum, mean, and maximum soil boring iron and aluminum concentrations are presented in Table 10. Adsorption modeling in PHREEQC revealed a large range of adsorption capacities expected for the different constituents at the site. Figure 15 displays the predicted trajectories of aqueous concentrations before and after adsorption onto Hfo and Hao in soils (minimum, mean and maximum Hfo and Hao), as additional arsenic, boron, cobalt, and molybdenum are titrated into solution. The bold lines display the geometric means for all groundwater scenarios within each soil scenario and the grey area represents the range for the 5th to 95th percentile of all soil scenarios. As mentioned in Section 2.4.3.1.2, lithium adsorption to iron and aluminum oxyhydroxides was not modeled due to a lack of available thermodynamic data.

The predicted trajectories are compared against the GWPS and porewater concentrations. On the plots, the further the predicted trajectories are to the right of the 1:1 line, the larger the amount of the constituent that has sorbed to Hfo and Hao surface sites in soils and is no longer predicted to reside in the aqueous phase. For boron, little to no adsorption is predicted by the model, so aqueous concentration before adsorption are almost identical to concentrations after adsorption. For arsenic, a large proportion is expected to adsorb, with a capacity to bring

average arsenic concentrations to below 0.01 mg/L when concentrations are at approximately 10 mg/L or lower prior to adsorption. At higher arsenic concentrations (> 10 mg/L), the relative sorption capacity is diminished as sorption sites are filled and aqueous concentrations after adsorption are predicted to increase above its GWPS. For cobalt and molybdenum, the trajectories run parallel to the 1:1 line, indicating that sorption capacity is directly proportional to the concentration before adsorption. The modeling results suggest that adsorption has the capacity to reduce cobalt concentrations below approximately 0.1 mg/L down to the GWPS of 0.01 mg/L and molybdenum concentrations below approximately 0.2 mg/L down to the GWPS of 0.1 mg/L. The 95th percentile of modeled trajectories show that a minority of pH and redox conditions at site were less favorable for attenuating cobalt or molybdenum, as seen by the proximity to the 1:1 line.

5.1.2 Co-precipitation

In addition to adsorption, co-precipitation or the direct incorporation of trace metals such as cobalt into precipitated iron oxide-oxyhydroxides has been well studied in literature (Butt et al. 2000; Dzombak and Morel 1990; Smith 1999). For the soils analyzed by sequential extraction (Section 3.2.2), all samples had higher concentrations of cobalt in the amorphous and metal hydroxide phases than indicated by adsorption modeling. This suggests that cobalt concentrations also may be attenuated during the formation of ferrihydrite (Butt et al. 2000; Tebo et al. 2004). Cobalt was also identified by SEP to be associated with carbonate minerals, likely due to co-precipitation with the dolomite or calcite identified by mineralogical analysis. Arsenic co-precipitation with amorphous phases of iron and other metal oxyhydroxides is also considered possible. However, per the SEP results, no arsenic was found to be associated with carbonate minerals. Co-precipitation is either not likely or relevant for boron, lithium, and molybdenum.

5.1.3 Physical Attenuation

Table 9 presents the predicted concentrations at Assessment Monitoring wells, assuming the minimum and maximum amount of dilution and dispersion downgradient of the CCR Unit (Section 4.0). The highest concentrations of arsenic, boron, cobalt, lithium, and molybdenum measured in porewater were “diluted” in the geochemical simulations with the maximum concentrations observed in side-gradient wells GAMW-52, GAMW-52B, GAMW-56, and GAMW-56B to provide a conservative estimate of dilution and dispersion.

For arsenic, cobalt, and lithium, the maximum concentrations in porewater were below the GWPS. Dilution and dispersion with groundwater from side-gradient wells generally resulted in a further decrease below the GWPS. At GAMW-56, arsenic and cobalt concentrations were elevated over those in porewater. Consequently, dilution/dispersion of porewater with water from GAMW-56 resulted in higher concentrations relative to porewater, though still below GWPS.

For boron the maximum porewater concentrations were elevated above the health-based standard (345%) and for molybdenum, the maximum porewater concentrations were elevated above the GWPS (810%). The 32 to 63 percent reduction in concentrations by dilution and dispersion alone was not sufficient to bring the maximum porewater concentrations below the relevant standards. For boron, concentrations in background monitoring well GAMW-15 were twice as high as those in porewater. Due to this background source, boron concentrations in side-gradient wells are also relatively high and limit the effectiveness of dilution to reduce boron concentrations downgradient of the CCR Unit. For molybdenum, concentrations in monitoring wells have been below GWPS since March 2018, indicating additional dilution/dispersion or other attenuating processes have reduced porewater concentrations between the CCR Unit and the monitoring wells. As a consequence, molybdenum concentrations will likely remain below the GWPS.

5.2 Long-Term Stability of Attenuated Constituents

The expected variations in dissolved concentration as a function of pH, Eh, and TDS are presented in Figures 16, 17, and 18, respectively. Results are presented along with GWPS values and the range of pH, Eh, or TDS values (5th percentile to 95th percentile) observed at the Site. Responses to changes in pH, Eh, and TDS vary widely by constituent. The results of the adsorption stability modeling for arsenic, boron, cobalt, and molybdenum can be summarized as follows:

- **Arsenic:** For the range of pH values observed at the site, greater than 95% of the arsenic is expected to sorb to Hfo and Hao (Figure 16a). At pH values below 6.0, a conversion of arsenate to arsenite is modeled to release the adsorbed arsenic into groundwater. For alkaline pH values between 8.0 and 10.0, there is a small amount of additional capacity for arsenic to adsorb. At extremely alkaline conditions (pH greater than 10.0), higher proportions of negatively-charged sorption sites on Hfo and Hao limit the effectiveness of sorption of anionic species, resulting in higher amounts of desorbed arsenic. Under reducing conditions (Eh less than -100 mV), arsenic is largely present as arsenite and sorption is limited (Figure 17a). Over intermediate redox conditions (Eh between 0 and 500 mV), adsorbed arsenic is relatively stable. Above 500 mV, arsenic is expected to desorb again. Under increasing TDS concentrations (Figure 18a), arsenic sorption declines as other anions compete with and replace arsenic from sorption surfaces. For arsenic, TDS concentrations at the Site could quadruple relative to observed values before aqueous concentrations increase above the GWPS.
- **Boron:** Based on the relatively small proportion of boron that can be adsorbed to Hfo and Hao surface sites, changes in pH, Eh, and TDS concentrations are modeled to have only a minor impact on aqueous concentrations, as evidenced by the horizontal trends in Figures 16b, 17b, and 18b.
- **Cobalt:** The pH response of cobalt (Figure 16c) is broadly similar to that of arsenic, with cobalt being nearly completely in dissolved form under acidic conditions but generally sorbed under alkaline conditions. Cobalt was generally modeled to be unresponsive to changes in redox conditions (Figure 17c), with little additional cobalt sorbing or desorbing over the range of tested Eh conditions. Cobalt was also not responsive to increases in TDS concentrations (Figure 18c), with sorption remaining relatively unchanged as TDS concentrations increased 4- to 40-fold above the commonly-observed range at the Site.
- **Molybdenum:** For molybdenum, lower pH values (more acidic conditions) were generally more favorable for adsorption (Figure 16d). At alkaline pH values (pH greater than 10), nearly all molybdenum is desorbed and present in the dissolved phase. Over the range of common Eh values at site (Figure 17d), molybdenum sorption is relatively stable. Highly reducing conditions are predicted to increase molybdenum adsorption and highly oxidizing conditions are predicted to reduce adsorption. Molybdenum adsorption is generally insensitive to increases in TDS concentrations (Figure 18d), with TDS concentrations up to 10,000 mg/L less than doubling the aqueous concentrations due to desorption.

6.0 TIER I EVALUATION

The potential for natural attenuation of arsenic, boron, cobalt, lithium, and molybdenum was evaluated in accordance with recommended practices and guidance promulgated by the USEPA and the ITRC (USEPA 2007a; USEPA 2007b; ITRC 2010). According to USEPA (USEPA 2007a), the purpose of the Tier 1 evaluation is to “Demonstrate that the groundwater plume is not expanding and that sorption of the contaminant onto aquifer solids is occurring where immobilization is the predominant attenuation process.” Based on this definition, the following observations support MNA as a viable corrective measure for the CCR Unit:

- **Plume Stability:** Based on the water quality monitoring data presented in this Assessment Monitoring, groundwater concentrations of arsenic, boron, cobalt, lithium, and molybdenum outside of the CCR Unit appear to be stable or decreasing. Evaluation of trend charts generally did not reveal increasing trends in wells downgradient of the CCR Unit (Figures 4 to 8), including for parameters such as boron and sulfate, which are considered common indicators of CCR leaching (Figures 5 and 10). These observations indicate that the distribution of arsenic, boron, cobalt, lithium, and molybdenum in the aquifer is stable.
- **Magnitude of Exceedances:** Arsenic has remained below the CCR Unit GWPS (0.091 mg/L) in all downgradient monitoring wells. Boron concentrations exceed the health-based standard (4 mg/L) in nine of the downgradient (Downgradient Monitoring and Assessment Monitoring) wells, but concentrations are generally within the range of background monitoring well concentrations, suggesting naturally-elevated levels or an alternative source of boron causing the concentrations in groundwater at the Site. The cobalt concentration in groundwater at GAMW-08, the only downgradient monitoring well exceeding the GWPS, has shown a decreasing trend since 2016. The most recent concentration of cobalt (0.011 mg/L in November 2019) was just 0.001 mg/L above the GWPS of 0.010 mg/L. No wells exceed the health-based lithium standard (0.04 mg/L). Molybdenum concentrations in all wells have been consistently below the health-based standard of 0.1 mg/L since August 2017, indicating a low likelihood of a future exceedances based on historical trends.
- **CCR Unit Porewater:** The CCR Unit at RMSGS was placed into service in 1976 and historical records are not available for ash additions or porewater concentrations over the CCR Unit's lifespan. However, based on recent porewater data, the arsenic concentration in the CCR Unit (0.011 mg/L to 0.018 mg/L) is well below the GWPS of 0.091 mg/L. Cobalt and lithium concentrations in porewater in the CCR Unit were low and only detected above their laboratory reporting limit in a single sample (0.0022 mg/L and 0.016 mg/L, respectively). This indicates that the CCR Unit is not a potential source for these metals. Boron concentrations in the porewater (8.3 mg/L to 13.8 mg/L) are elevated above the health-based standard of 4 mg/L but are below levels observed in the two deep background monitoring wells GAMW-07B (15-23 mg/L) and GAMW-15B (13-18 mg/L). Molybdenum in the CCR Unit was measured at concentrations up to 0.81 mg/L, above its GWPS. Even so, molybdenum concentrations in groundwater downgradient of the CCR Unit are currently below the GWPS.
- **Groundwater Chemistry:** The groundwater monitoring results and the findings of the geochemical modeling support the potential for natural attenuation of arsenic, boron, cobalt, lithium, and molybdenum. Equilibrium of groundwater with the mineral phase ferrihydrite was modeled to occur in all groundwater samples and calcite equilibrium was indicated in all downgradient monitoring wells except GAMW-53. This is consistent with the results from the sequential extraction analysis that indicate carbonate, amorphous, and metal hydroxide fractions sequester arsenic, boron, cobalt, lithium, and molybdenum.
- **Confirmation of Attenuation/Immobilization:** Based on both mineralogical and chemical analysis, it is evident that attenuation of arsenic, cobalt, lithium, and molybdenum by aquifer materials is occurring. Iron, capable of forming (hydr)oxide phases that facilitate metals attenuation (Dzombak and Morel 1990), was identified in all overburden samples. Mineralogical analysis confirmed iron was present as an oxide phase in the form of hematite in all overburden samples. Arsenic, cobalt, lithium, and molybdenum demonstrated a high degree of immobilization due to attenuation on carbonate, amorphous, and metal hydroxide fractions. This indicates that these phases have been and are scavenging or attenuating constituents that were once present in solution. Groundwater samples from Assessment Monitoring wells GAMW-53/53B, GAMW-

54/54B, GAMW-55/55B, and GAMW-56/56B report a similar major ion signature as groundwater in monitoring wells proximal to the CCR Unit. However, no arsenic, cobalt, lithium, or molybdenum has been detected in these wells above background levels. In addition, soil borings from these wells contained significant proportions of constituents attenuated in various phases, especially in the case of lithium. As a result, the groundwater concentrations of these constituents are maintained at low levels, demonstrating attenuation.

Based on these findings, arsenic, boron, cobalt, lithium, and molybdenum were considered candidates for an MNA remedy application and were deemed to meet the criteria for Tier I MNA in accordance with USEPA guidance (USEPA 2007a,b).

7.0 TIER II EVALUATION

The purpose of the Tier II evaluation is to "Identify mechanisms and rates of the operative attenuation process." Based on this definition, the following modeling results and observations support MNA as a viable corrective measure for the CCR Unit:

- **Adsorption Capacity Modeling:** PHREEQC modeling results show that adsorption is likely attenuating arsenic, cobalt and, to a lesser degree, molybdenum downgradient of the CCR Unit. This is concluded based on equilibration of site-specific groundwater compositions with the range of Hfo and Hao concentrations observed in SEP results of Site overburden soils. Minor amounts of boron are also expected to attenuate. The sorbing capacity of Hfo and Hao surface sites is partially dependent on the concentrations of the constituents of interest in groundwater. The titration modeling (Figure 15) shows how the soil's capacity to adsorb constituents increases if groundwater concentrations of arsenic, boron, cobalt, and molybdenum were to increase above current levels. In addition to metal oxyhydroxides, clay minerals and/or particular organics can also act as a substrate for attenuation (Goldberg et al. 1993; Goldberg and Forster 1996), but this mechanism was not included in the current evaluation.

  The findings from the modeling are supported by the results of the sequential extraction testing. The presence of arsenic, cobalt, lithium, and molybdenum in the amorphous and metal oxyhydroxide fractions of soils indicates that adsorption is occurring spatially across the monitored area downgradient of the CCR Unit.

- **Co-precipitation:** In addition to adsorption, co-precipitation or the direct incorporation of trace metals such as cobalt into precipitated iron oxide-oxyhydroxides has been well studied in literature (Butt et al. 2000; Dzombak and Morel 1990; Smith 1999). For the soils analyzed by sequential extraction (Section 3.2.2), all samples had higher concentrations of cobalt in the amorphous and metal hydroxide phases than indicated by adsorption modeling. This suggests that cobalt concentrations also may be attenuated during the formation of ferrihydrite (Butt et al. 2000; Tebo et al. 2004). Cobalt was also identified by SEP to be associated with carbonate minerals, likely the result of co-precipitation with dolomite or calcite, which were identified by mineralogical analysis. Arsenic co-precipitation with amorphous phases of iron and other metal oxyhydroxides is also possible. However, there was no arsenic associated with carbonate minerals as identified by SEP. Co-precipitation is either not likely or relevant for boron, lithium, and molybdenum.

- **Estimated Site Attenuation Rates:** Concentrations of boron, cobalt, lithium, and molybdenum are decreasing in downgradient monitoring wells, resulting in negative calculated point decay rates. A positive point decay rate for arsenic suggests that its concentrations are increasing, but low concentrations in porewater indicate that the trend does not imply an impact from the CCR Unit. Increasing arsenic concentrations in Assessment Monitoring wells GAMW-52B, GAMW-53B, GAMW-54, and GAMW-54B are

driving the positive point decay rate, but the arsenic concentrations in these wells are low (less than 0.005 mg/L) and are likely driven by natural variability. Using the mean decay rate, maximum concentrations of boron, cobalt and molybdenum observed in downgradient and Assessment monitoring wells would take approximate 41 years, 39 years, and 20 years, respectively, to attenuate to below GWPS. Arsenic and lithium concentrations in downgradient and Assessment Monitoring wells are already below the GWPS.

- **Advanced Groundwater Modeling:** Groundwater flow results indicate between 32% and 63% dilution and dispersion of groundwater at monitoring wells with upgradient and side-gradient water as it flows towards the Assessment Monitoring wells. This dilution and dispersion attenuate concentrations along the flow paths. Arsenic, cobalt, and lithium concentrations in porewater are already below GWPS in the available monitoring data (August 2018 to March 2020). Dilution and dispersion with groundwater from side-gradient Assessment Monitoring wells (GAMW-52/52B and GAMW-56/56B) would further reduce these concentrations relative to the GWPS. Boron and molybdenum concentrations are elevated above the health-based standards in porewater (and in background wells for boron). As such, while dilution and dispersion reduce concentrations by about 30% to 60%, this is insufficient to dilute porewater to such a degree that the resulting boron and molybdenum concentration decline to below the health-based standards. The concentrations of molybdenum measured in downgradient groundwater at Assessment Monitoring wells have remained below the GWPS, so additional physical and/or chemical attenuation is likely occurring between the CCR Unit and the Assessment Monitoring wells. Modeled groundwater velocities indicate that travel times between downgradient and Assessment Monitoring wells are between 4.5 and 31 years. The modeling results also indicate that groundwater would take between 27 and 130 years to travel from the downgradient monitoring wells to the property boundary (GAMW-46/46B).

Based on these findings, arsenic, boron, cobalt, lithium, and molybdenum were considered to be candidates for an MNA remedy application and deemed to meet the criteria for Tier II MNA in accordance with USEPA guidance (USEPA 2007a and 2007b).

8.0 TIER III EVALUATION

According to USEPA (USEPA 2007a), the purpose of the Tier III evaluation is to eliminate sites for an MNA remedy where (1) “Capacity of the aquifer is insufficient to attenuate the COC mass to regulatory standards” and/or (2) “Stability of the immobilized COC is insufficient to prevent remobilization due to future changes in groundwater chemistry”. Based on this definition, the following observations support MNA as a viable corrective measure for the CCR Unit:

- **Adsorption Capacity Modeling:** For arsenic, titration modeling shows that groundwater concentrations could increase up to approximately 2.5 mg/L before exceeding the capacity of soils (95th percentile of scenarios) to attenuate arsenic below the GWPS (0.091 mg/L). Groundwater arsenic concentrations up to 10 mg/L are predicted to attenuate below the GWPS for the average soil capacity scenario. Similarly, cobalt concentrations in groundwater could increase up to approximately 0.02 mg/L before exceeding the capacity of soils (95th percentile of scenarios) to attenuate cobalt below the GWPS (0.01 mg/L). Under the average soil capacity scenario, the aquifer has the capacity to reduce cobalt concentrations as high as 0.1 mg/L to below the GWPS.

  For boron and molybdenum, modeling suggests that adsorption can reduce a portion of the dissolved load, but that there is not sufficient adsorption capacity alone to reduce the concentrations observed in porewater below the health-based standard. However, current molybdenum concentrations observed in downgradient

and Assessment Monitoring wells indicate that the combined long-term attenuation from sorption, dilution, and dispersion is sufficient to reduce concentrations below health-based standards. In addition to iron oxyhydroxides, molybdenum and boron (as well as arsenic and cobalt) are known to adsorb to other metal (hydr)oxides (e.g., manganese, aluminum), clay minerals and particulate organic matter, providing additional sorption capacity in the soils.

- **Stability Modeling for Adsorbed Constituents:** Stability modeling indicates that for the conditions (i.e. pH, Eh, and TDS ranges) determined in groundwater at the Site, adsorbed species of arsenic, boron, cobalt, and molybdenum are relatively stable and remain attenuated. The modeling results further suggest that the adsorption of arsenic, cobalt, and molybdenum could be reversed with sufficiently large fluctuations in pH and Eh conditions at the Site, but there is no historical basis to expect such occurrences. Based on the mineralogical test results for Site soils, carbonate minerals are widely distributed downgradient of the CCR Unit. Groundwater that is in contact with carbonate minerals is typically buffered against large fluctuations in pH. Total alkalinity concentrations in groundwater at the Site (generally between 50 and 410 mg $CaCO_3$/L) support the notion that the groundwater has significant buffering capacity.

  Modeling results also indicate that increasing TDS concentrations could result in an increase in aqueous concentrations of arsenic, cobalt, and molybdenum due to competition for sorption sites. However, the impact is predicted to be relatively minor over the range of TDS concentrations observed at the site. The maximum TDS concentration measured in porewater was 3,830 mg/L and even at those levels, there is sufficient attenuation capacity from the soils to maintain arsenic, boron, cobalt, and molybdenum concentrations below GWPS

9.0 CONCLUSIONS

Golder performed a supplemental Assessment Monitoring followed by an attenuation evaluation, which serve as the Tier I, II, and III evaluation of MNA feasibility at RMSGS for arsenic, boron, cobalt, lithium, and molybdenum with respect to the CCR Unit. This evaluation has been completed in accordance with guidance and best practices promulgated by the USEPA (USEPA 2007a and 2007b) and the ITRC (ITRC 2010). Based on the results of this evaluation, Golder makes the following assessment for the individual parameters:

- Arsenic: Physical and chemical attenuation is occurring and co-precipitation is possible, levels are stable, and the aquifer has the capacity to attenuate arsenic. Arsenic is a candidate for MNA at the RMSGS Site.
- Boron: Physical attenuation of boron is occurring at the RMSGS based on substantial decreases of boron in assessment wells. However, the high levels of boron upgradient of the CCR impoundments make it difficult to determine if the evaluation of if MNA will be successful. An alternative or natural source of boron should be further investigated prior to making a MNA determination for boron based on current findings.
- Cobalt: Chemical and physical attenuation is occurring and co-precipitation is possible, levels are stable, and the aquifer has the capacity to attenuate arsenic. Cobalt is a candidate for MNA at the RMSGS Site.
- Lithium: Physical attenuation is occurring, levels are stable, and the aquifer has the capacity to attenuate arsenic. Lithium is a candidate for MNA at the RMSGS Site.
- Molybdenum: Physical and some chemical attenuation is occurring, levels are stable, and the aquifer has the capacity to attenuate arsenic. Molybdenum is a candidate for MNA at the RMSGS Site.

Therefore, it is recommended that a Tier IV evaluation be completed to design a long-term monitoring plan and contingent remedy for arsenic, boron, cobalt, lithium, and molybdenum.

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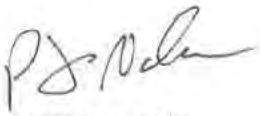
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Tables

Table 4: Summary of Travel Time Simulations and Attenuation Estimates
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

	Shallow Flow Paths				Deep Flow Paths			
Starting Well	**GAMW-16**	**GAMW-18**	**GAMW-17B**	**GAMW-09B**	**GAMW-16B**	**GAMW-18B**	**GAMW-17B**	**GAMW-09B**
Ending Well	**GAMW-53**	**GAMW-55**	**GAMW-54B**	**GAMW-54B**	**GAMW-53B**	**GAMW-55B**	**GAMW-54B**	**GAMW-54B**
Distance (ft)	**1521**	**1964**	**1200**	**1714**	**1521**	**1964**	**1200**	**1714**
Effective Porosity = 16%								
Travel Time (years)	4.8	11.0	4.5	8.9	5.0	11.0	5.5	9.0
Velocity (ft/year)	317	179	267	193	304	179	218	190
Time to Davis Ditch (years)	5.5	-	-	-	6	-	-	-
Time to property boundry near GAMW46B (years)	-	27	49	41	-	28.5	45	41
Effective Porosity = 30%								
Travel Time (years)	8.5	19.8	8.0	16.0	8.9	20.0	10.0	16.5
Velocity (ft/year)	179	99	150	107	171	98	120	104
Time to Davis Ditch (years)	10	-	-	-	9.9	-	-	-
Time to property boundry near GAMW46B (years)	-	49.8	79	75	-	51.5	80	76
Effective Porosity = 46%								
Travel Time (years)	13.0	31.0	12.0	25.0	13.5	29.0	15.0	25.0
Velocity (ft/year)	117	63	100	69	113	68	80	69
Time to Davis Ditch (years)	15	-	-	-	15	-	-	-
Time to property boundry near GAMW46B (years)	-	76.8	122	117	-	77	130	120
Estimate of Dilution/Attenuation Along Flow Path								
Starting concentration (mg/L)	9.7	13	12	12	9.7	13	12	12
End concentration (mg/L)	3.1	8.2	6.4	6.4	3.1	8.2	6.4	6.4
End Concentration as % of starting concentration	32%	63%	53%	53%	32%	63%	53%	53%
Dilution/Attenuation along flow path	68%	37%	47%	47%	68%	37%	47%	47%

Notes:
ft = feet
mg/L = milligrams per liter

Prepared by: GOL
Checked by: PJN
Reviewed by: RWB

Table 5: Groundwater Geochemical Modeling Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAPIEZ06 08-2018	GAPIEZ06 09-2018	GAPIEZ06 10-2018	DAPZ-02A 03-2020	DAPZ-02B 03-2020	GAMW04 10-2018	GAMW04 04-2019	GAMW04 11-2019	GAMW07 10-2018	GAMW07 05-2019	GAMW07 11-2019	GAMW07B 09-2018	GAMW07B 10-2018	GAMW07B 05-2019	GAMW07B 11-2019
Charge Balance	% error	-3.9	-1.3	-5.5	-7.8	-4.3	5.1	-1.3	-9.0	-3.7	-3.7	**-10.8**	**82.8**	-6.8	-7.0	**-10.1**
MINERAL PHASES - Saturation Indices [a]																
Otavite	$CdCO_3$	-2.3	-2.3	-1.1	-3.2	-2.6	-2.9	-3.1	-2.4	-3.8	-2.3	-2.1	-1.5	-3.2	-2.4	-2.8
Ferrihydrite	$Fe(OH)_3$	**2.1**	**2.1**	**3.1**	**0.5**	**2.2**	**2.9**	**1.4**	**0.5**	-6.6	**1.9**	**0.4**	**3.6**	-1.6	**4.2**	**-0.2**
Siderite	$FeCO_3$	**-0.1**	**-0.1**	-0.8	**-0.4**	-0.7	-2.1	**0.5**	-1.7	-3.3	-3.6	-1.4	**1.1**	-0.5	-0.7	**-0.3**
Melanterite	$FeSO_4 7H_2O$	-4.9	-5.0	-7.2	-4.5	-5.1	-6.1	-4.0	-6.5	-6.7	-8.3	-6.5	-6.8	-4.4	-5.3	-4.5
Anglesite	PbSO	-4.5	-4.5	-6.1	-4.2	-4.4	-4.0	-4.2	-4.5	-4.2	-4.5	-4.7	-7.4	-4.0	-4.3	-4.1
Gypsum	$CaSO_4:2H_2O$	-0.6	-0.6	-0.6	-0.7	-1.0	**0.0**	**-0.4**	-0.7	-0.6	-0.7	-0.7	-2.5	**-0.2**	**-0.2**	**-0.2**
Jarosite-H	$(H_3O)Fe_3(SO_4)_2(OH)_6$	-7.1	-6.9	-11.4	-7.6	-5.6	-3.6	-8.9	-10.7	-26.4	-6.7	-12.2	-10.2	-15.0	-0.7	-12.1
Jarosite-K	$KFe_3(SO_4)_2(OH)_6$	**-0.4**	**-0.3**	-3.0	-2.1	**1.3**	**4.5**	-1.3	-4.3	-21.4	**0.2**	-5.3	-2.2	-8.4	**6.8**	-5.1
Jarosite-Na	$NaFe_3(SO_4)_2(OH)_6$	-2.5	-2.4	-4.9	-5.0	-1.8	**1.6**	-3.0	-6.7	-24.5	-3.0	-8.6	-4.3	-10.6	**4.5**	-7.6
Calcite	$CaCO_3$	**0.3**	**0.2**	**1.8**	-0.6	**-0.4**	**0.0**	**0.1**	**0.1**	-1.2	**0.2**	**0.4**	**1.3**	**-0.3**	**0.4**	**0.0**
Magnesite	$MgCO_3$	-0.9	-1.0	**0.5**	-2.1	-1.7	-1.5	-1.4	-1.3	-2.6	-1.1	-0.9	**0.0**	-1.5	-0.8	-1.3
Barite	BaSO	**0.7**	**0.6**	**0.7**	**1.0**	**0.9**	**0.9**	**1.1**	**0.9**	**0.9**	**0.9**	**0.7**	-1.2	**1.2**	**1.1**	**1.0**
Witherite	$BaCO_3$	-3.8	-3.9	-2.3	-4.4	-3.9	-4.4	-3.7	-3.6	-5.1	-3.7	-3.5	-2.7	-4.3	-3.6	-4.1
Fluorite	CaF_2	-1.0	-0.8	-1.0	-2.0	-2.4	-2.3	-1.5	-2.1	-1.1	-0.8	-1.0	**0.8**	**-0.4**	-0.6	-0.6
CoCO3	$CoCO_3$	-4.2	-4.4	-2.9	-4.3	-4.2	-4.1	-4.2	-4.3	-4.3	-3.1	-3.0	-3.2	-5.0	-4.2	-4.6
Cerrusite	$PbCO_3$	-2.0	-2.1	-2.1	-2.6	-2.0	-2.2	-2.0	-2.1	-3.2	-2.0	-2.0	-1.9	-2.5	-2.0	-2.2
Carbon Dioxide	$pCO_2(g)$ [b]	-2.3	-2.2	-4.5	-1.0	-1.8	-2.4	-2.4	-1.7	**-0.3**	-1.8	-2.1	-3.2	-1.6	-2.4	-2.0

Notes:
Charge balances errrors highlighted in **red** are greater than +/-10%
Non-detect values assumed equal to 1/2 analytical detection limit
Redox converted from field ORP to Eh by +200 mV
[a] Saturation indices greater than -0.5 are identified by bold type and grey shading
[b] pCO2(g) values presented at $10^{\wedge value}$ atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW08 10-2018	GAMW08 05-2019	GAMW08 11-2019	GAMW08B 09-2018	GAMW08B 10-2018	GAMW08B 05-2019	GAMW08B 11-2019	GAMW09 10-2018	GAMW09 05-2019	GAMW09 11-2019	GAMW09B 09-2018	GAMW09B 10-2018	GAMW09B 05-2019	GAMW09B 11-2019
Charge Balance	% error	-2.9	-3.7	-6.6	-9.7	**-12.2**	-8.3	**-11.7**	-5.0	-5.0	-6.0	-5.7	-6.7	-3.0	-6.5
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-2.5	-2.1	-2.0	-2.3	-2.5	-2.5	-2.2	-3.0	-2.8	-2.8	-2.4	-2.3	-2.2	-2.2
Ferrihydrite	$Fe(OH)_3$	**1.7**	**2.3**	**2.4**	**1.8**	**3.1**	**4.1**	**3.6**	**0.2**	**1.3**	**0.7**	**2.0**	**2.5**	**3.7**	**2.2**
Siderite	$FeCO_3$	-1.8	-2.2	-2.1	**0.2**	**0.1**	**-0.4**	**0.1**	-2.3	-3.1	-2.5	**-0.2**	**-0.1**	**-0.2**	**0.1**
Melanterite	$FeSO\ 7H_2O$	-6.7	-7.3	-7.2	-4.5	-4.4	-4.9	-4.6	-6.7	-7.3	-7.0	-5.1	-5.1	-5.2	-5.0
Anglesite	PbSO	-4.6	-4.8	-4.8	-4.4	-4.2	-4.2	-4.4	-4.3	-4.2	-4.3	-4.5	-4.6	-4.7	-4.7
Gypsum	$CaSO :2H_2O$	-0.7	-0.6	-0.5	**-0.2**	**-0.2**	**-0.2**	**-0.2**	-0.7	-0.6	-0.8	-0.8	-0.7	-0.8	-0.9
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-6.6	-6.5	-6.5	-8.4	-3.5	-0.9	-3.6	-10.6	-8.2	-10.1	-6.8	-6.1	-2.6	-7.3
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	**0.0**	**0.9**	**1.0**	-1.3	**3.4**	**6.2**	**4.0**	-4.3	-1.3	-3.7	**-0.3**	**0.5**	**4.2**	-0.7
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	-2.9	-2.1	-1.9	-3.1	**1.4**	**4.3**	**2.0**	-7.1	-4.2	-6.5	-2.2	-1.5	**2.1**	-2.9
Calcite	$CaCO_3$	**0.2**	**0.5**	**0.7**	**0.6**	**0.3**	**0.3**	**0.6**	**-0.3**	**-0.3**	**-0.4**	**0.0**	**0.3**	**0.2**	**0.2**
Magnesite	$MgCO_3$	-1.2	-0.7	-0.6	-0.9	-1.1	-1.2	-0.8	-2.0	-1.8	-2.0	-1.0	-0.8	-0.8	-0.8
Barite	BaSO	**0.7**	**0.9**	**1.0**	**1.0**	**0.9**	**0.8**	**0.8**	**0.6**	**0.8**	**0.6**	**0.8**	**0.8**	**0.7**	**0.5**
Witherite	$BaCO_3$	-3.7	-3.3	-3.2	-3.6	-4.0	-4.0	-3.7	-4.3	-4.2	-4.3	-3.7	-3.6	-3.6	-3.7
Fluorite	CaF_2	**-0.4**	**-0.1**	**-0.2**	**-0.4**	**-0.5**	**-0.2**	**-0.3**	-1.9	-1.9	-1.9	-0.5	-0.6	-0.6	-0.6
CoCO3	$CoCO_3$	-2.9	-2.8	-2.5	-4.0	-4.4	-4.3	-4.0	-4.8	-4.7	-4.8	-4.1	-4.3	-4.4	-4.0
Cerrusite	$PbCO_3$	-2.2	-1.9	-1.9	-2.0	-2.1	-2.1	-1.9	-2.4	-2.2	-2.3	-2.1	-2.0	-2.0	-2.0
Carbon Dioxide	$pCO_2(g)$ [b]	-1.5	-1.8	-2.0	-2.6	-2.3	-2.5	-2.7	-1.7	-2.1	-2.0	-2.1	-2.2	-2.2	-2.4

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW15 10-2018	GAMW15 05-2019	GAMW15 11-2019	GAMW15B 09-2018	GAMW15B 10-2018	GAMW15B 05-2019	GAMW15B 11-2019	GAMW16 10-2018	GAMW16 05-2019	GAMW16 11-2019	GAMW16B 09-2018	GAMW16B 10-2018	GAMW16B 05-2019	GAMW16B 11-2019
Charge Balance	% error	0.4	-4.5	-7.1	-5.7	-3.8	-5.0	-5.3	-0.7	-7.5	8.2	-3.0	-2.7	-4.4	-8.7
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-4.3	-2.6	-2.3	-2.0	-3.0	-2.5	-2.3	-2.3	-2.2	-4.1	-1.8	-2.7	-2.4	-2.1
Ferrihydrite	$Fe(OH)_3$	-6.2	**2.7**	**2.5**	**3.3**	-2.6	**3.8**	**1.1**	**0.0**	**3.3**	**4.1**	**4.1**	**0.5**	**4.2**	**3.8**
Siderite	$FeCO_3$	-1.6	**0.1**	**0.2**	**0.0**	-0.9	-0.8	**0.0**	**-0.3**	-0.7	-3.0	**0.6**	**-0.1**	**-0.1**	**0.5**
Melanterite	$FeSO\ 7H_2O$	-4.7	-4.4	-4.9	-5.1	-5.0	-5.2	-4.8	-5.3	-5.6	-6.2	-4.8	-4.6	-4.8	-4.5
Anglesite	PbSO	-4.3	-4.4	-4.7	-4.7	-4.1	-4.2	-4.5	-4.6	-4.5	-4.1	-4.9	-4.3	-4.4	-4.6
Gypsum	$CaSO :2H_2O$	-1.1	-0.9	-1.1	-0.6	-0.6	**-0.3**	**-0.4**	-0.9	-0.6	-0.6	**-0.4**	**-0.4**	**-0.3**	**-0.3**
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-23.5	-4.2	-5.9	-4.8	-18.1	-1.4	-10.2	-13.0	-3.6	-2.5	-2.9	-9.9	-0.7	-3.0
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	-19.4	**2.5**	**0.5**	**2.3**	-12.0	**5.9**	-3.2	-6.6	**3.4**	**4.5**	**4.3**	-3.7	**6.4**	**4.3**
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	-21.9	**-0.1**	-2.0	**0.3**	-13.9	**3.9**	-5.3	-9.1	**0.8**	**1.9**	**2.1**	-5.9	**4.1**	**2.6**
Calcite	$CaCO_3$	-2.1	**-0.3**	**-0.1**	**0.6**	**-0.4**	**0.2**	**0.4**	**0.1**	**0.3**	-1.5	**0.9**	**0.1**	**0.4**	**0.7**
Magnesite	$MgCO_3$	-3.4	-1.4	-1.3	-0.8	-1.8	-0.9	-1.0	-1.4	-1.1	-3.0	**-0.5**	-1.4	-0.9	-0.7
Barite	BaSO	**0.5**	**0.8**	**0.5**	**1.1**	**1.0**	**1.4**	**1.0**	**0.5**	**0.7**	**0.6**	**1.0**	**1.0**	**1.2**	**1.1**
Witherite	$BaCO_3$	-5.8	-4.0	-3.8	-3.1	-4.2	-3.5	-3.5	-3.9	-3.7	-5.6	-3.0	-3.9	-3.4	-3.2
Fluorite	CaF_2	-1.3	-1.5	-1.3	-1.4	-1.3	-1.0	-0.9	-0.8	-0.8	-0.8	-1.0	-1.1	-1.0	-0.9
CoCO3	$CoCO_3$	-5.5	-3.6	-3.6	-4.0	-4.8	-4.3	-4.1	-4.1	-4.0	-5.8	-3.6	-4.5	-4.2	-3.9
Cerrusite	$PbCO_3$	-3.7	-2.1	-2.1	-1.9	-2.4	-2.0	-2.0	-2.1	-2.0	-3.4	-1.9	-2.3	-2.0	-2.0
Carbon Dioxide	$pCO_2(g)$ [b]	**0.1**	-1.9	-2.1	-2.6	-1.5	-2.2	-2.4	-2.0	-2.2	-4.8	-2.7	-1.7	-2.3	-2.6

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW17 10-2018	GAMW17 05-2019	GAMW17 11-2019	GAMW17B 09-2018	GAMW17B 10-2018	GAMW17B 05-2019	GAMW17B 11-2019	GAMW18 10-2018	GAMW18 04-2019	GAMW18 11-2019	GAMW18B 09-2018	GAMW18B 10-2018	GAMW18B 04-2019	GAMW18B 11-2019
Charge Balance	% error	0.8	-0.5	-6.6	-3.6	1.1	0.6	-4.3	**-10.9**	-6.4	-9.2	-3.2	**-10.4**	**-48.7**	**-10.9**
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-2.8	-2.2	-1.9	-2.0	-2.2	-2.3	-2.0	-3.0	-3.0	-2.5	-2.0	-2.9	-4.7	-2.1
Ferrihydrite	$Fe(OH)_3$	-2.9	**2.5**	**2.9**	**3.3**	**0.1**	**3.6**	**4.3**	-0.7	**1.7**	**0.9**	**2.8**	**0.6**	**2.1**	**2.2**
Siderite	$FeCO_3$	-2.1	-2.6	-2.6	**0.4**	**0.3**	**0.1**	**-0.1**	-2.5	-2.9	-1.8	**0.6**	-0.5	-5.1	**0.1**
Melanterite	$FeSO\ 7H_2O$	-6.8	-7.7	-8.1	-5.0	-4.9	-5.0	-5.5	-6.7	-6.8	-6.4	-4.5	-4.7	-7.3	-4.9
Anglesite	PbSO	-4.5	-4.8	-5.0	-4.9	-4.8	-4.8	-4.9	-4.3	-4.1	-4.3	-4.6	-4.1	-3.7	-4.6
Gypsum	$CaSO :2H_2O$	-0.8	-1.0	-1.1	-0.9	-0.9	-1.0	-0.9	-0.6	**-0.4**	**-0.3**	**-0.4**	**-0.5**	**-0.4**	-0.6
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-19.9	-6.7	-6.3	-4.5	-13.3	-2.1	-1.6	-12.0	-5.3	-9.3	-5.6	-8.8	-5.3	-7.6
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	-14.0	**0.2**	**0.6**	**2.5**	-6.5	**4.7**	**5.5**	-6.4	**0.8**	-2.8	**1.6**	-2.6	**1.1**	-0.5
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	-16.7	-2.4	-2.1	**0.2**	-8.8	**1.8**	**2.9**	-9.0	-1.7	-5.3	**-0.3**	-4.4	-2.5	-2.4
Calcite	$CaCO_3$	**-0.2**	**0.1**	**0.4**	**0.5**	**0.3**	**0.2**	**0.4**	**-0.4**	**-0.4**	**0.3**	**0.6**	**-0.3**	-2.1	**0.4**
Magnesite	$MgCO_3$	-1.4	-0.8	-0.7	-0.9	-1.0	-0.9	-0.7	-2.2	-2.1	-1.5	-0.6	-1.5	-4.6	-0.7
Barite	BaSO	**0.8**	**0.6**	**0.6**	**0.7**	**0.8**	**0.9**	**0.8**	**0.7**	**0.9**	**1.0**	**1.0**	**0.9**	**1.0**	**0.6**
Witherite	$BaCO_3$	-4.0	-3.6	-3.3	-3.2	-3.4	-3.3	-3.2	-4.5	-4.5	-3.8	-3.3	-4.3	-6.0	-3.7
Fluorite	CaF_2	**-0.5**	-0.6	-0.6	-1.1	-1.3	-1.3	-1.3	-3.3	-2.9	-2.3	-1.2	-1.3	-0.9	-1.0
CoCO3	$CoCO_3$	-4.6	-4.0	-3.8	-4.0	-4.0	-4.2	-3.8	-4.8	-5.2	-4.3	-4.1	-5.0	-6.8	-4.3
Cerrusite	$PbCO_3$	-2.4	-2.0	-2.0	-2.0	-2.0	-2.1	-2.0	-2.5	-2.4	-2.1	-2.0	-2.3	-3.8	-2.0
Carbon Dioxide	$pCO_2(g)$ [b]	-1.6	-2.4	-2.6	-2.3	-2.1	-1.7	-2.4	-1.2	-1.5	-1.8	-2.4	-1.5	-3.9	-2.4

Notes:
Charge balances errrors highlighted in **red** are greater than +/-10%
Non-detect values assumed equal to 1/2 analytical detection limit
Redox converted from field ORP to Eh by +200 mV
[a] Saturation indices greater than -0.5 are identified by bold type and grey shading
[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW52 09-2018	GAMW52 10-2018	GAMW52 05-2019	GAMW52 11-2019	GAMW52B 09-2018	GAMW52B 10-2018	GAMW52B 05-2019	GAMW52B 11-2019	GAMW53 09-2018	GAMW53 10-2018	GAMW53 04-2019	GAMW53 11-2019	GAMW53B 09-2018	GAMW53B 10-2018
Charge Balance	% error	-2.9	3.4	4.0	-1.3	-7.2	1.1	-1.7	-6.4	3.9	2.9	-1.5	1.3	-0.7	-1.6
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-1.9	-2.7	-2.3	-1.9	-1.6	-2.9	-2.3	-2.4	-3.5	-3.0	-4.0	-3.5	-2.2	-2.2
Ferrihydrite	$Fe(OH)_3$	**2.9**	**2.2**	**2.3**	**2.3**	**3.4**	**1.5**	**3.8**	**2.0**	**-0.1**	-1.9	-0.8	-1.1	**1.1**	**1.3**
Siderite	$FeCO_3$	-1.0	-2.7	-3.1	-1.3	**1.2**	**-0.1**	**-0.4**	**-0.1**	-1.4	-1.1	-2.9	-2.3	**0.1**	**0.1**
Melanterite	$FeSO\ 7H_2O$	-6.9	-8.4	-8.9	-7.3	-5.2	-5.3	-5.7	-5.3	-5.9	-6.0	-6.7	-6.7	-5.1	-5.1
Anglesite	PbSO	-5.4	-5.3	-5.5	-5.5	-5.9	-4.9	-5.0	-4.8	-4.4	-4.6	-4.5	-4.7	-4.8	-4.7
Gypsum	$CaSO :2H_2O$	-1.6	-2.0	-2.3	-1.7	-1.2	-1.2	-1.3	-1.1	-2.0	-1.9	-2.4	-2.3	-0.8	-0.7
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-6.2	-7.4	-7.9	-8.7	-7.5	-8.4	-2.7	-7.4	-9.6	-16.9	-11.6	-13.6	-9.8	-9.2
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	**0.3**	-1.3	-1.7	-2.0	**0.1**	-1.9	**4.2**	-0.7	-5.0	-11.7	-6.6	-8.6	-3.6	-2.8
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	-2.4	-4.1	-4.5	-4.7	-1.8	-3.8	**2.2**	-2.6	-7.9	-14.6	-9.6	-11.7	-5.6	-4.8
Calcite	$CaCO_3$	**0.2**	**-0.4**	**-0.4**	**0.2**	**1.1**	**0.0**	**0.1**	**0.1**	-1.7	-1.1	-2.6	-2.0	**0.3**	**0.3**
Magnesite	$MgCO_3$	-1.1	-1.6	-1.5	-1.0	**-0.2**	-1.3	-1.1	-1.2	-2.9	-2.4	-3.5	-3.0	-1.3	-1.3
Barite	BaSO	**0.0**	-0.6	-0.8	**-0.3**	**1.1**	**1.1**	**1.1**	**1.3**	**-0.3**	**-0.3**	**-0.3**	**-0.3**	**0.6**	**0.7**
Witherite	$BaCO_3$	-3.5	-4.3	-4.3	-3.7	-1.9	-3.1	-2.8	-2.9	-5.3	-4.8	-5.9	-5.3	-3.5	-3.5
Fluorite	CaF_2	-2.0	-2.2	-2.4	-2.1	**0.4**	-2.4	-2.4	-2.3	-2.8	-2.7	-4.8	-4.7	-1.5	-1.6
CoCO3	$CoCO_3$	-3.7	-4.4	-4.2	-3.8	-3.2	-4.5	-4.0	-4.1	-5.1	-4.6	-5.9	-5.4	-4.0	-4.0
Cerrusite	$PbCO_3$	-2.0	-2.1	-2.0	-2.0	-2.0	-2.2	-2.0	-2.1	-2.6	-2.3	-3.1	-2.8	-2.1	-2.1
Carbon Dioxide	$pCO_2(g)$ [b]	-2.1	-1.8	-1.9	-2.3	-3.0	-1.8	-2.1	-2.1	-0.9	-1.3	-1.2	-1.3	-1.9	-2.0

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW53B 04-2019	GAMW53B 11-2019	GAMW54 09-2018	GAMW54 10-2018	GAMW54 04-2019	GAMW54 11-2019	GAMW54B 09-2018	GAMW54B 10-2018	GAMW54B 05-2019	GAMW54B 11-2019	GAMW55 09-2018	GAMW55 10-2018	GAMW55B 09-2018	GAMW55B 10-2018
Charge Balance	% error	-2.8	-2.7	-1.7	2.0	-3.0	-3.0	-1.5	1.8	-6.0	-3.8	-1.3	0.7	-6.0	-2.6
MINERAL PHASES - Saturation Indices [a]															
Otavite	$CdCO_3$	-2.1	-2.1	-3.3	-1.7	-2.8	-2.3	-2.7	-1.2	-2.4	-2.4	-2.8	-2.5	-2.6	-2.5
Ferrihydrite	$Fe(OH)_3$	**4.1**	**3.3**	**1.5**	**-0.3**	**1.4**	**1.0**	**1.0**	**2.9**	**3.4**	**2.8**	**2.1**	**0.9**	**1.2**	**1.7**
Siderite	$FeCO_3$	**-0.4**	**0.1**	-2.5	-0.6	-2.1	-1.1	**-0.1**	**1.5**	**0.1**	**0.1**	-1.2	-1.4	**-0.1**	**0.0**
Melanterite	$FeSO\ 7H_2O$	-5.8	-5.3	-6.7	-6.6	-6.6	-6.5	-4.7	-4.7	-4.8	-4.7	-5.8	-6.1	-4.7	-4.7
Anglesite	PbSO	-4.9	-4.9	-4.5	-5.4	-4.5	-5.1	-4.3	-5.8	-4.5	-4.5	-4.4	-4.5	-4.4	-4.4
Gypsum	$CaSO :2H_2O$	-0.9	-1.0	-1.3	-1.4	-1.2	-1.6	-0.6	-0.6	-0.6	-0.6	-0.6	-0.5	-0.5	**-0.5**
Jarosite-H	$(H_3O)Fe_3(SO\ )_2(OH)_6$	-1.4	-4.2	-4.8	-17.1	-7.5	-10.3	-8.3	-9.7	-2.4	-3.8	-4.3	-9.0	-7.9	-6.8
Jarosite-K	$KFe_3(SO\ )_2(OH)_6$	**5.2**	**2.4**	**0.0**	-10.5	-1.7	-4.4	-2.1	-1.6	**4.2**	**2.7**	**1.7**	-2.6	-1.7	**-0.4**
Jarosite-Na	$NaFe_3(SO\ )_2(OH)_6$	**3.0**	**0.2**	-2.4	-12.9	-4.1	-7.0	-4.0	-3.6	**2.2**	**0.7**	-0.9	-5.2	-3.6	-2.3
Calcite	$CaCO_3$	**0.4**	**0.3**	-1.1	**0.5**	-0.7	**-0.2**	**-0.1**	**1.6**	**0.2**	**0.2**	**-0.1**	**0.1**	**0.1**	**0.2**
Magnesite	$MgCO_3$	-1.1	-1.2	-2.5	-0.8	-1.8	-1.5	-1.5	**0.2**	-1.1	-1.1	-1.7	-1.4	-1.4	-1.2
Barite	BaSO	**0.5**	**0.7**	**0.4**	**0.3**	**0.4**	**-0.1**	**1.1**	**1.1**	**1.1**	**1.1**	**1.0**	**0.9**	**1.3**	**1.2**
Witherite	$BaCO_3$	-3.5	-3.3	-4.8	-3.2	-4.4	-4.0	-3.7	-2.1	-3.5	-3.5	-3.8	-3.7	-3.5	-3.4
Fluorite	CaF_2	-1.5	-1.3	-2.6	-2.6	-2.7	-2.2	-1.7	-1.5	-1.4	-1.3	-1.4	-1.5	-2.0	-2.1
CoCO3	$CoCO_3$	-3.9	-3.9	-5.1	-3.5	-4.6	-4.2	-4.5	-3.0	-4.2	-4.2	-3.5	-3.4	-4.6	-4.3
Cerrusite	$PbCO_3$	-2.0	-2.1	-2.8	-2.0	-2.2	-2.1	-2.3	-2.0	-2.1	-2.1	-2.4	-2.2	-2.3	-2.2
Carbon Dioxide	$pCO_2(g)$ [b]	-2.0	-2.2	-1.0	-2.7	-1.6	-1.7	-1.6	-3.5	-1.9	-1.8	-1.4	-1.7	-1.7	-1.9

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Table 5: Groundwater Geochemical Modeling Re
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Parameter	Units	GAMW55B 05-2019	GAMW55B 11-2019	GAMW55R 11-2019	GAMW56 09-2018	GAMW56 10-2018	GAMW56 04-2019	GAMW56 11-2019	GAMW56B 09-2018	GAMW56B 10-2018	GAMW56B 04-2019	GAMW56B 11-2019
Charge Balance	% error	-5.4	-6.2	-5.5	4.4	-1.6	61.8	3.5	0.7	2.6	-13.1	-4.8
MINERAL PHASES - Saturation Indices [a]												
Otavite	$CdCO_3$	-2.4	-2.2	-2.3	-2.4	-2.0	-2.7	-2.2	-2.3	-2.3	-2.3	-2.3
Ferrihydrite	$Fe(OH)_3$	**3.0**	**2.0**	**1.4**	**1.5**	**2.5**	**2.9**	**1.7**	**1.2**	**2.0**	**3.7**	**1.7**
Siderite	$FeCO_3$	**0.0**	**0.2**	-1.9	**0.5**	**0.8**	-0.7	**0.1**	**0.2**	**0.1**	**0.2**	**0.1**
Melanterite	$FeSO\ 7H_2O$	-4.8	-4.8	-6.9	-5.1	-5.1	-5.9	-5.6	-5.0	-5.2	-4.8	-4.9
Anglesite	PbSO	-4.5	-4.6	-4.6	-5.4	-5.5	-5.1	-5.4	-5.0	-5.1	-4.7	-4.7
Gypsum	$CaSO :2H_2O$	-0.6	-0.6	-0.8	-1.7	-1.7	-1.9	-1.7	-1.2	-1.3	-1.0	-0.9
Jarosite-H	$(H_3O)Fe_3(SO)_2(OH)_6$	-3.6	-7.1	-8.6	-8.3	-6.6	-4.3	-8.7	-8.8	-6.6	-1.5	-7.8
Jarosite-K	$KFe_3(SO)_2(OH)_6$	**2.9**	**-0.5**	-1.9	-2.5	**-0.4**	**2.4**	-2.6	-2.6	**-0.4**	**4.6**	-1.2
Jarosite-Na	$NaFe_3(SO)_2(OH)_6$	**1.0**	-2.4	-4.4	-5.4	-3.2	**0.4**	-5.7	-5.0	-2.7	**1.7**	-3.5
Calcite	$CaCO_3$	**0.2**	**0.4**	**0.2**	**-0.1**	**0.2**	-0.6	**0.1**	**0.0**	**0.0**	**0.0**	**0.1**
Magnesite	$MgCO_3$	-1.1	-1.0	-1.2	-1.5	-1.1	-1.2	-1.2	-1.2	-1.1	-1.3	-1.1
Barite	BaSO	**1.0**	**1.0**	**0.6**	**0.0**	**0.0**	**-0.1**	**-0.1**	**0.6**	**0.4**	**0.8**	**0.9**
Witherite	$BaCO_3$	-3.5	-3.4	-3.8	-3.7	-3.5	-4.2	-3.7	-3.6	-3.6	-3.5	-3.5
Fluorite	CaF_2	-2.0	-2.0	-1.3	-0.8	-1.0	-1.7	-1.2	-1.7	-1.9	-1.7	-1.7
CoCO3	$CoCO_3$	-4.2	-4.0	-4.1	-3.8	-2.9	-3.4	-2.9	-4.2	-4.2	-4.2	-4.2
Cerrusite	$PbCO_3$	-2.1	-2.1	-2.1	-2.2	-2.0	-2.2	-2.1	-2.1	-2.1	-2.0	-2.0
Carbon Dioxide	$pCO_2(g)$ [b]	-2.0	-2.1	-2.0	-1.2	-1.6	-1.6	-1.6	-1.4	-1.3	-1.6	-1.8

Notes:

Charge balances errrors highlighted in **red** are greater than +/-10%

Non-detect values assumed equal to 1/2 analytical detection limit

Redox converted from field ORP to Eh by +200 mV

[a] Saturation indices greater than -0.5 are identified by bold type and grey shading

[b] pCO2(g) values presented at 10^{value} atm

Prepared by GOL
Checked by PJN
Reviewed by RV

Table 6: Average Point Decay Rates in Background and Downgradient Wells
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Constituent	Units	Point Decay Constants (first-order decay)	
		Background Wells	All Downgradient Wells (including Assessment Wells)
Arsenic	yr^{-1}	-0.33	**0.11**
Boron	yr^{-1}	0.04	**-0.04**
Cobalt	yr^{-1}	0.36	**-0.05**
Lithium	yr^{-1}	0.20	**-0.06**
Molybdenum	yr^{-1}	0.28	**-0.03**

Notes:
yr^{-1} = rate per year

Prepared by: GOL
Checked by: PJN
Reviewed by: RV

Table 7: Summary of Rietveld Quantitative Analysis X-Ray Diffraction Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Mineral	Mineral Formula	OW-9 18-20' (wt %)	OW-9 10-12' (wt %)	SB-52B-35'-37' (wt %)	SB-54B-30'-32' (wt %)	SB-56B-30'-32' (wt %)
Quartz	SiO_2	69	60	53	61	72
Pyrite	FeS_2	-	-	0.39	0.10	0.12
Marcasite	FeS_2	-	-	0.22	-	-
Muscovite	$KAl_2(AlSi_3O_{10})(OH)_2$	3.6	3.5	7.8	1.7	1.3
Biotite	$K(Mg,Fe)_3(AlSi_3O_{10})(OH)_2$	-	-	1.1	0.57	0.16
Chlorite	$(Fe,(Mg,Mn)_5,Al)(Si_3Al)O_{10}(OH)_8$	-	-	2.6	1.0	1.1
Microcline	$KAlSi_3O_8$	5.2	9.1	9.2	7.5	6.6
Orthoclase	$KAlSi_3O_8$	-	-	2.2	0.65	0.57
Hematite	Fe_2O_3	-	-	0.26	0.44	0.57
Dolomite	$CaMg(CO_3)_2$	6.5	9.8	7.9	9.6	5.3
Calcite	$CaCO_3$	4.8	3.6	4.7	5.8	3.9
Albite	$NaAlSi_3O_8$	8.3	11	7.3	9.1	6.4
Epidote	$Ca_2(Al,Fe)Al_2O(SiO_4)(Si_2O_7)(OH)$	1.6	1.5	2.8	2.1	1.9
Anatase	TiO_2	-	-	-	-	-
Cancrinite	$Na_6Ca(CO_3)(AlSiO_4)_6 \cdot 2H_2O$	0.87	1.7	-	-	-
TOTAL		100	100	100	100	100

Notes:

wt % = percent by weight of each mineral

Non-detect minerals within a sample are represented with "-"

Prepared by: GOL
Checked by: PJN
Reviewed by: RV

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Aluminum	Total Metal Result	1900	3100 J+	2200 J+	1100	1300	3200	1500	1400	2000	2200	1600
Aluminum	SEP Step 1	52 U	48 U	47 U	47 U	51 U	44 U	48 U	44 U	49 U	48 U	49 U
Aluminum	SEP Step 2	15 J	63 J	16 J	35 UJ	38 UJ	8.8 J	11 J	33 UJ	12 J	36 UJ	5.9 J
Aluminum	SEP Step 3	44	540	60	15	31	33	75	30	34	23	29
Aluminum	SEP Step 4	300	1600	280	160	130	110	130	100	130	100	360
Aluminum	SEP Step 5	200 UJ	80 J	180 U	170 U	190 UJ	28 J	31 J	34 J	180 UJ	180 UJ	180 UJ
Aluminum	SEP Step 6	1000	1600	840	520	1100	1200	750	820	1400	1200	1300
Aluminum	SEP Step 7	22000	11000	23000	15000	23000	25000	16000	19000	23000	21000	25000
Aluminum	SEP SUM	23000	15000	24000	16000	24000	26000	17000	20000	24000	22000	27000
Aluminum	SEP TOTAL	25000	21000	29000	19000	23000	28000	18000	20000	29000	31000	23000
Antimony	Total Metal Result	7.7 U	18 U	17 U	17 U	7 U	6.3 UJ	6.9 UJ	6.6 UJ	7 U	7 U	7 U
Antimony	SEP Step 1	16 U	14 U	14 U	14 U	15 U	13 U	14 U	13 U	15 U	14 U	15 U
Antimony	SEP Step 2	12 U	11 U	11 U	10 U	12 U	10 U	11 U	10 U	11 U	11 U	11 U
Antimony	SEP Step 3	3.9 U	3.6 U	3.5 U	3.5 U	3.8 U	3.3 U	3.6 U	3.3 U	3.7 U	3.6 U	3.6 U
Antimony	SEP Step 4	3.9 U	3.6 U	3.5 U	3.5 U	3.8 U	3.3 U	3.6 U	3.3 U	3.7 U	3.6 U	3.6 U
Antimony	SEP Step 5	59 U	54 U	53 U	52 U	58 U	50 U	53 U	50 U	55 U	54 U	55 U
Antimony	SEP Step 6	3.9 U	3.6 U	3.5 U	3.5 U	3.8 U	3.3 U	3.6 U	3.3 U	3.7 U	3.6 U	3.6 U
Antimony	SEP Step 7	0.45 J	3.6 U	3.5 U	3.5 U	0.54 J	3.3 U	3.6 U	0.16 J	0.29 J	3.6 U	0.3 J
Antimony	SEP SUM	0.45 J	3 U	3 U	3 U	0.54 J	3 U	3 U	0.16 J	0.29 J	3 U	0.3 J
Antimony	SEP TOTAL	0.53 J	3.6 U	3.5 U	3.5 U	0.27 J	3.3 U	3.6 J	3.3 U	0.33 J	3.6 U	0.29 J
Arsenic	Total Metal Result	1.7 J	0.62 J	1.7 J	0.69 J	1.9 J	5.4 J	5	1.3 J	2.3	2 J	5
Arsenic	SEP Step 1	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	2.4 U
Arsenic	SEP Step 2	2 U	1.8 UJ	1.8 U	1.7 U	1.9 U	0.46 J	1.8 U	1.7 U	1.8 UJ	1.8 UJ	1.8 UJ
Arsenic	SEP Step 3	0.37 J	0.45 J	0.43 J	0.17 J	0.27 J	0.83	0.83	0.44 J	0.45 J	0.37 J	1.9
Arsenic	SEP Step 4	0.69	0.6 U	0.94	0.73	0.66	0.71 J+	0.59 U	0.56 U	0.68	0.5 J	1.1
Arsenic	SEP Step 5	9.8 U	9 U	8.8 U	8.7 U	9.6 U	8.3 UJ	8.9 UJ	8.3 UJ	9.1 U	9 U	9.1 U
Arsenic	SEP Step 6	1.2	0.3 J	0.56 J	0.54 J	1.7	2.2	1.6	0.89	1.8	1.4	3.8
Arsenic	SEP Step 7	1.3 U	0.7	0.39 J	0.34 J	1.3 U	1.2	1	0.88	1.2 U	0.6 U	1.2 U
Arsenic	SEP SUM	2.2	1.4	2.3	1.8	2.6	5.4	4	2.7	2.9	2.7	7.3
Arsenic	SEP TOTAL	2.1	2.2	1.9	3	3.1	5.4 J	5.6	2.5	4.7	3.9	6.2

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Barium	Total Metal Result	6.9 J+	7.3 J+	13	4.1	4.3 J+	8.4 J+	4.6 J+	4.3 J+	6.2	6.1	6.1
Barium	SEP Step 1	13 U	1.1 J	0.58 J	12 U	13 U	11 U	12 U	11 U	12 U	12 U	12 U
Barium	SEP Step 2	0.5 J	1.7 J	0.62 J	8.7 UJ	0.46 J	0.52 J	0.54 J	0.54 J	0.56 J	0.44 J	0.96 J
Barium	SEP Step 3	3.3 U	3.6	2.9 U	2.9 U	3.2 U	2.8 U	3 U	2.8 U	3 U	3 U	3 U
Barium	SEP Step 4	2.2 J	2.6 J	5.3	1.6 J	1.4 J	2.4 J	0.97 J	1.1 J	2.2 J	1.9 J	2.2 J
Barium	SEP Step 5	49 UJ	45 UJ	44 UJ	44 UJ	48 UJ	42 UJ	45 UJ	42 UJ	46 UJ	45 UJ	46 UJ
Barium	SEP Step 6	2.3 J	2.2 J	2.2 J	1.2 J	1.9 J	2 J	1.6 J	1.5 J+	2.3 J	2 J	2.4 J
Barium	SEP Step 7	250	230	350	220	220	250 J	190	220	230	190	260
Barium	SEP SUM	250	240	360	220	230	250	190	220	240	190	260
Barium	SEP TOTAL	270	300	390	210	190	200	170	200	220	200	230
Beryllium	Total Metal Result	1.3 U	0.053 J	0.12 J	0.064 J	1.2 U	0.19 J	1.1 U	1.1 U	1.2 U	1.2 U	1.2 U
Beryllium	SEP Step 1	1.3 U	1.2 U	1.2 U	1.2 U	1.3 U	1.1 U	1.2 U	1.1 U	1.2 U	1.2 U	1.2 U
Beryllium	SEP Step 2	0.98 UJ	0.9 UJ	0.88 UJ	0.87 UJ	0.96 UJ	0.83 UJ	0.89 UJ	0.83 UJ	0.91 UJ	0.9 UJ	0.91 UJ
Beryllium	SEP Step 3	0.33 U	0.026 J	0.021	0.29 U	0.32 U	0.28 U	0.3 U	0.28 U	0.3 U	0.3 U	0.3 U
Beryllium	SEP Step 4	0.33 U	0.026 J	0.024 J	0.02 J	0.32 U	0.28 U	0.3 U	0.28 U	0.3 U	0.3 U	0.03 J
Beryllium	SEP Step 5	4.9 UJ	4.5 UJ	4.4 UJ	4.4 UJ	4.8 UJ	4.2 UJ	4.5 UJ	4.2 UJ	4.6 UJ	4.5 UJ	4.6 UJ
Beryllium	SEP Step 6	0.045 J	0.024 J	0.036 J	0.027 J	0.039 J	0.042 J	0.026 J	0.027 J	0.045 J	0.037 J	0.067 J
Beryllium	SEP Step 7	0.29 J	0.21 J	0.39	0.24 J	0.31 J	0.35	0.23 J	0.28	0.3	0.25 J	0.46
Beryllium	SEP SUM	0.34	0.29	0.47	0.28	0.35	0.39	0.25	0.31	0.34	0.29	0.56
Beryllium	SEP TOTAL	0.37	0.3	0.41	0.28 J	0.26 J	0.35	0.25 J	0.27 J	0.33	0.27 J	0.33
Boron	Total Metal Result	26 U	5.5	7.4	3.6	23 U	21 U	23 U	22 U	23 U	23 U	23 U
Cadmium	Total Metal Result	0.64 U	0.24 U	0.11 J	0.072 J	0.59 U	0.53 U	0.57 U	0.55 U	0.58 U	0.58 U	0.3 J
Cadmium	SEP Step 1	1.3 U	1.2 U	1.2 U	1.2 U	1.3 U	1.1 U	1.2 U	1.1 U	1.2 U	1.2 U	1.2 U
Cadmium	SEP Step 2	0.98 U	0.9 U	0.88 U	0.87 U	0.96 U	0.83 U	0.89 U	0.83 U	0.91 U	0.9 U	0.91 U
Cadmium	SEP Step 3	0.33 U	0.3 UJ	0.29 UJ	0.29 UJ	0.32 U	0.28 UJ	0.3 UJ	0.28 UJ	0.3 UJ	0.3 UJ	0.3 UJ
Cadmium	SEP Step 4	0.077 J	0.059 J	0.09 J	0.083 J	0.076 J	0.086 J	0.08 J	0.076 J	0.069 J	0.065 J	0.059 J
Cadmium	SEP Step 5	4.9 U	4.5 U	4.4 U	4.4 U	4.8 U	4.2 U	4.5 U	4.2 U	4.6 U	4.5 U	4.6 U
Cadmium	SEP Step 6	0.33 U	0.3 U	0.29 U	0.29 U	0.32 U	0.28 U	0.3 U	0.28 U	0.026 J	0.013 J	0.3 U
Cadmium	SEP Step 7	0.33 U	0.3 U	0.29 U	0.29 U	0.32 U	0.28 U	0.3 U	0.28 U	0.3 U	0.3 U	0.3 U
Cadmium	SEP SUM	0.077 J	0.11 J	0.09 J	0.083 J	0.076 J	0.086 J	0.08 J	0.076 J	0.095 J	0.077 J	0.059 J
Cadmium	SEP TOTAL	0.015 J	0.3 U	0.29 U	0.29 U	0.065 J	0.28 U	0.3 U	0.28 U	0.18 J	0.12 J	0.058 J

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Chromium	Total Metal Result	4.3	2.9	4.4	2.5	2.8	8.2 J	5.1	3.4	5	6	3.2
Chromium	SEP Step 1	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	2.4 U
Chromium	SEP Step 2	2 UJ	1.8 U	0.28 J	1.7 U	1.9 UJ	0.37 J	0.37 J	1.7 U	0.31 J	1.8 U	1.8 U
Chromium	SEP Step 3	0.29 J	0.37 J	0.52 J	0.16 J	0.17 J	1.1	0.97	0.27 J	1.1	0.14 J	0.19 J
Chromium	SEP Step 4	1.2	1.1	0.94	0.57 J	0.55 J	0.68	0.58 J	0.51 J	0.73	0.6	1
Chromium	SEP Step 5	9.8 U	9 UJ	1.5 J	1.3 J	9.6 U	8.3 U	8.9 U	8.3 U	9.1 U	9 U	9.1 U
Chromium	SEP Step 6	2.5	0.99	2.1	1.7	3.1	3.5	2.2	2.2	3.7	3.3	3
Chromium	SEP Step 7	5.5	3.7	7.3	5.2	7.2	9	5	7.3	8.5	6.7	13
Chromium	SEP SUM	9.4	8.1	13	8.8	11	15	9.1	10	14	11	17
Chromium	SEP TOTAL	9.5	6.9	11	8.3	8.8	16 J	10	8.7	17	13	9.2
Cobalt	Total Metal Result	3.5 J	1.1	1.8	2.2	2.9 J	5.2 J	5.7	2.6 J	5.7 J	3.9 J	3 J
Cobalt	SEP Step 1	13 U	12 U	12 U	12 U	13 U	11 U	12 U	11 U	12 U	12 U	12 U
Cobalt	SEP Step 2	0.54 J	9 U	8.8 U	8.7 U	0.35 J	0.44 J	0.63 J	0.38 J	0.62 J	0.41 J	0.26 J
Cobalt	SEP Step 3	0.55 J	0.1 J	0.27 J	0.19 J	0.37 J	0.45 J	1.2 J	0.53 J	0.47 J	0.39 J	0.37 J
Cobalt	SEP Step 4	0.83 J	0.29 J	0.87 J	1.2 J	0.97 J	0.71 J	1.1 J	0.66 J	1.6 J	0.91 J	0.76 J
Cobalt	SEP Step 5	49 UJ	45 UJ	44 UJ	44 UJ	48 UJ	42 UJ	45 UJ	42 UJ	46 UJ	45 UJ	46 UJ
Cobalt	SEP Step 6	1.3 J	0.3 J	0.66 J	0.68 J	1.8 J	2.1 J	1.5 J	0.97 J	2.5 J	1.5 J	2.9 J
Cobalt	SEP Step 7	0.8 J	3 U	0.69 J	0.69 J	1.1 J	0.82 J	0.44 J	0.43 J	1.5 J	0.8 J	0.81 J
Cobalt	SEP SUM	4	0.69 J	2.5	2.8	4.6	4.5	4.8	3	6.7	4	5.1
Cobalt	SEP TOTAL	4.2 J	0.87 J	2.5 J	3.2	4.8 J	4.7 J	5.2 J	3.2	6.1	4.3	4.5 J
Iron	Total Metal Result	4900	1500	4400	2600	3400	6800	7900	3700	5800	5900	5600
Iron	SEP Step 1	26 U	24 U	23 U	23 U	26 U	22 U	24 U	22 U	24 U	24 U	24 U
Iron	SEP Step 2	260 J	31 J	61 J	29 J	190 J	130 J	200 J	99 J	280 J	160 J	140 J
Iron	SEP Step 3	950	280	710	150	600	590	2600	470	740	700	1200
Iron	SEP Step 4	1100	770	1700	1100	1000	1200	1100	830	1400	1500	1400
Iron	SEP Step 5	98 UJ	90 UJ	88 UJ	87 UJ	96 UJ	83 UJ	89 UJ	83 UJ	91 UJ	90 UJ	91 UJ
Iron	SEP Step 6	2600	870	2100	1500	2800	3300	2600	2000	3800	3300	4600
Iron	SEP Step 7	1800	1300	2400	2000	2900	2500	2000	2100	3700	2400	3100
Iron	SEP SUM	6700	3200	7100	4700	7600	7700	8500	5500	9900	8100	10000
Iron	SEP TOTAL	6300	3400	7500	5500	7000	8400	8700	5700	9900	8600	6800

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Lead	Total Metal Result	4.4	1.4	3.1	1.8	2.9	6.6 J	3.2	2.4	4.2	3.7	3.5
Lead	SEP Step 1	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	2.4 U
Lead	SEP Step 2	1.9 J	1.8 U	1.8 U	1.7 U	0.92 J	0.85 J	1.8 U	0.66 J	0.86 J	0.82 J	0.75 J
Lead	SEP Step 3	0.66 UJ	0.61 J	0.59 UJ	0.58 UJ	0.64 UJ	0.55 UJ	0.59 UJ	0.56 UJ	0.61 UJ	0.6 UJ	0.61 UJ
Lead	SEP Step 4	1.2	0.65	1.7	1.2	1.4	2.3	1.8	1.5	2.3	1.8	2
Lead	SEP Step 5	9.8 UJ	9 UJ	8.8 UJ	8.7 UJ	9.6 UJ	8.3 UJ	8.9 UJ	8.3 UJ	9.1 UJ	9 UJ	9.1 UJ
Lead	SEP Step 6	1.1	0.67	0.67	0.35 J	0.78	1.8	1.1	0.72	1.6	1.3	3.4
Lead	SEP Step 7	3.2	3.1	5.3	3.2	3.5	3.3	2.5	2.6	2.8	4.7	2.9
Lead	SEP SUM	7.4	5	7.7	4.8	6.6	8.2	5.3	5.5	7.5	8.6	9.1
Lead	SEP TOTAL	7	5.7	7.4	5.6	5	7.5 J	4.9	5.1	6.7	5.6	6.2
Lithium	Total Metal Result	4.6 J	1.4 J	3.6 J	2.2 J	3.3 J	6.6 J+	3.1 J+	3.4 J+	5.4 J	5.2 J	3.5 J
Lithium	SEP Step 1	13 U	12 U	12 U	12 U	13 U	11 U	12 U	11 U	12 U	12 U	12 U
Lithium	SEP Step 2	9.8 U	9 U	8.8 U	8.7 U	9.6 U	8.3 U	8.9 U	8.3 U	0.71 J	0.72 J	9.1 U
Lithium	SEP Step 3	3.3 U	3 U	2.9 U	2.9 U	3.2 U	2.8 U	3 U	2.8 U	3 U	3 U	3 U
Lithium	SEP Step 4	0.78 J	0.5 J	0.81 J	0.55 J	0.62 J	1 J	0.64 J	0.71 J	1.1 J	1 J	1.3 J
Lithium	SEP Step 5	49 U	45 U	44 U	44 U	48 U	42 U	45 U	42 U	46 U	45 U	46 U
Lithium	SEP Step 6	2.3 J	1.1 J	1.8 J	1.2 J	2.2 J	3	1.7 J	1.9 J	3.5	2.9 J	2.8 J
Lithium	SEP Step 7	4.4	2.5 J	3.4	2.1 J	3.8	6.1	2.6 J	3.1	5.6	4.2	7.1
Lithium	SEP SUM	12	4.1	6	3.8	11	14	7.8	5.7	19	18	19
Lithium	SEP TOTAL	8	4.2	6.8	5.4	7.5	10	6	7.5	11	10	7.2
Molybdenum	Total Metal Result	5.1 U	6.3	1.1 U	1.1 U	4.7 U	3.8 J	4 J	4.4 U	0.88 J	4.7 U	2.1 J
Molybdenum	SEP Step 1	10 U	13	9.4 U	9.3 U	10 U	8.9 U	9.5 U	8.9 U	9.8 U	9.6 U	9.7 U
Molybdenum	SEP Step 2	7.9 U	0.51 J	7 U	7 U	7.7 U	6.7 U	7.1 U	6.7 U	7.3 U	7.2 U	7.3 U
Molybdenum	SEP Step 3	2.6 U	1.2 J	2.3 U	2.3 U	2.6 U	0.51 J	2.2 J	0.27 J	0.59 J	2.4 U	0.5 J
Molybdenum	SEP Step 4	2.6 U	1.3 J	2.3 U	2.3 U	2.6 U	0.39 J	0.63 J	0.24 J	0.53 J	2.4 U	0.36 J
Molybdenum	SEP Step 5	39 U	36 U	35 U	35 U	38 U	33 U	36 U	33 U	37 U	36 U	1.7 J
Molybdenum	SEP Step 6	2.6 U	0.13 J	2.3 U	2.3 U	2.6 U	0.21 J	0.13 J	2.2 U	0.18 J	0.2 J	1.5 J
Molybdenum	SEP Step 7	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	0.16 J
Molybdenum	SEP SUM	2 U	16	2 U	2 U	2 U	1.1 J	3	0.51 J	1.3 J	0.2 J	4.3
Molybdenum	SEP TOTAL	0.94 J	15	0.22 J	0.15 J	0.54 J	2.4	3.8	0.67 J	2.4	0.48 J	2.4

Table 8: Sequential Extraction Procedure and Total Metal Solids Results
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Sample Location	SB-07B	DA-14	OW-9	OW-9	SB-08B	SB-52B	SB-53B	SB-53B	SB-54B	SB-55B	SB-56B
	Sample Start Depth (ft bgs)	35	4	10	18	30	35	25	30	30	30	30
	Sample End Depth (ft bgs)	37	6	12	20	32	37	27	32	32	32	32
	Well Type	Background	Drying Well	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
	Unit	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Analyte	SEP Step											
Selenium	Total Metal Result	1.9 U	4.8 U	4.6 U	4.6 U	0.53 J	1.6 U	0.51 J	0.74 J	0.68 J	0.65 J	1.8 U
Selenium	SEP Step 1	2.6 U	2.4 U	2.3 U	2.3 U	2.6 U	2.2 U	2.4 U	2.2 U	2.4 U	2.4 U	2.4 U
Selenium	SEP Step 2	2 U	1.8 U	1.8 U	1.7 U	1.9 U	1.7 U	1.8 U	1.7 U	1.8 UJ	1.8 UJ	1.8 UJ
Selenium	SEP Step 3	0.66 U	0.6 U	0.22 J	0.58 U	0.64 U	0.55 U	0.59 U	0.56 U	0.61 U	0.6 U	0.61 U
Selenium	SEP Step 4	1.1 J	0.6 UJ	0.6 J+	0.75 J+	1.3 J	0.64 J	0.59 UJ	0.56 UJ	0.71 J	0.6 UJ	0.59 J
Selenium	SEP Step 5	9.8 U	9 U	8.8 U	8.7 U	9.6 U	8.3 U	3.3 J	8.3 U	9.1 U	9 U	9.1 U
Selenium	SEP Step 6	0.66 U	0.6 U	0.59 U	0.58 U	0.64 U	0.55 U	0.59 U	0.56 U	0.61 U	0.6 U	0.61 U
Selenium	SEP Step 7	1.3 U	0.6 U	0.59 U	0.58 U	1.3 U	1.1 U	0.59 U	0.56 U	0.74 J	0.6 U	1.2 U
Selenium	SEP SUM	2.7	0.5 U	0.82	0.75	2.5	0.64	3.3	0.5 U	1.5	0.5 U	0.59
Selenium	SEP TOTAL	1.3 U	1.2 U	0.59 U	0.58 U	1.3 U	1.1 U	1.2 U	0.56 U	0.61 U	0.24 J	1.2 U
Thallium	Total Metal Result	4.5 U	7.2 U	6.9 U	6.8 U	4.1 U	3.7 u	4 U	3.9 U	4.1 U	4.1 U	4.1 U
Thallium	SEP Step 1	9.2 U	8.4 U	8.2 U	8.2 U	8.9 U	7.8 U	8.3 U	7.8 U	8.5 U	8.4 U	8.5 U
Thallium	SEP Step 2	6.9 U	6.3 U	6.2 U	6.1 U	6.7 U	5.8 U	6.2 U	5.8 U	6.4 U	6.3 U	6.4 U
Thallium	SEP Step 3	2.3 U	2.1 U	2.1 U	2 U	2.2 U	1.9 U	2.1 U	1.9 U	2.1 U	2.1 U	2.1 U
Thallium	SEP Step 4	2.3 U	2.1 U	2.1 UJ	2 UJ	2.2 U	1.9 U	2.1 U	1.9 U	2.1 U	2.1 U	2.1 U
Thallium	SEP Step 5	34 UJ	31 UJ	31 UJ	31 UJ	34 UJ	29 UJ	31 UJ	29 UJ	32 UJ	32 UJ	32 UJ
Thallium	SEP Step 6	2.3 U	2.1 U	2.1 U	2 U	2.2 U	1.9 U	2.1 U	1.9 U	2.1 U	2.1 U	2.1 U
Thallium	SEP Step 7	0.48 J	2.1 U	0.62 J	0.56 J	1.1 J	3.9 U	2.1 U	1.9 U	0.97 J	0.74 J	1.3 J
Thallium	SEP SUM	0.48 J	1.8 U	0.62 J	0.56 J	1.4 J	1.8 U	1.8 U	1.8 U	0.97 J	0.74 J	1.3 J
Thallium	SEP TOTAL	0.87 J	4.2 U	0.58 J	0.47 J	0.9 J	3.9 U	4.2 U	1.9 U	0.88 J	0.85 J	1.3 J

Notes:
All results displayed in milligram per kilogram (mg/kg).
ft bgs = feet below ground surface
SEP: Sequential Extraction Procedure
Step 1 - Exchangeable Phase: This extraction includes trace elements that are reversibly adsorbed to soil minerals, amorphous solids, and organic material by electrostatic forces.
Step 2 - Carbonate Phase: This extraction targets trace elements that are adsorbed or otherwise bound to carbonate minerals.
Step 3 - Non-Crystalline Materials Phase: This extraction targets trace elements that are complexed by amorphous minerals (e.g. iron).
Step 4 - Metal Hydroxide Phase: This extraction targets trace elements bound to hydroxides of iron, manganese, and/or aluminum.
Step 5 - Organic Phase: This extraction targets trace elements strongly bound via chemisorption to organic material.
Step 6 - Acid/Sulfide Fraction: The extraction is used to identify trace elements precipitated as sulfide minerals.
Step 7 - Residual Fraction: Trace elements remaining in the soil after the previous extractions will be distributed between silicates, phosphates, and refractory oxides.
U= The analyte was analyzed for, but was not detected above the level of the reported sample quantitation limit.
UJ= The analyte was analyzed for, but was not detected above the level of the reported sample quantitation limit, the quantitation limit is considered estimated.
J= The analyte was positively identified. The associated numerical value is the approximate concentration.
J+= The analyte was positively identified. The associated numerical value is the approximate concentration of the analyte in the sample and biased high.
Total Metal Results are the results of the 6010C analysis

Prepared by: DFSC
Checked by: KMC
Reviewed by: MAH

Table 9: Predicted Range of COI Concentrations in Assessment Wells Assuming Only Dilution and Dispersion
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

Constituent	Units	Site-Specific Groundwater Protection Standard[2]	Health-Based Standard	Maximimum concentration observed in Porewater	Maximimum concentration at side-gradient Assessment Wells:				Concentration at Assessment Wells assuming 32%[3] dilution of porewater with maximum concentration measured at:				Concentration at Assessment Wells assuming 63%[4] dilution of porewater with maximum concentration measured at:			
					GAMW-52	GAMW-52B	GAMW-56	GAMW-56B	GAMW-52	GAMW-52B	GAMW-56	GAMW-56B	GAMW-52	GAMW-52B	GAMW-56	GAMW-56B
Arsenic	mg/L	0.091	0.010	0.012	0.0025	0.0016	0.022	0.0025	0.0090	0.0087	0.015	0.0090	0.0060	0.0054	0.018	0.0060
Boron[1]	mg/L	-	4.0	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A	#N/A
Cobalt	mg/L	0.010	0.0060	0.0022	0.00058	0.00050	0.0084	0.00050	0.0017	0.0017	0.0042	0.0017	0.0012	0.0011	0.0061	0.0011
Lithium	mg/L	0.040	0.040	0.016	0.0062	0.0071	0.0053	0.0062	0.013	0.013	0.013	0.013	0.0098	0.010	0.0093	0.0098
Molybdenum	mg/L	0.10	0.10	0.81	0.0064	0.015	0.013	0.0064	0.55	0.56	0.55	0.55	0.30	0.31	0.31	0.30
Arsenic	Percentage relative to Groundwater Protection Standard	100%	-	13%	3%	2%	24%	3%	10%	10%	17%	10%	7%	6%	20%	7%
Boron		100%	-	345%	80%	33%	7%	80%	260%	245%	237%	260%	178%	148%	132%	178%
Cobalt		100%	-	22%	6%	5%	84%	5%	17%	17%	42%	17%	12%	11%	61%	11%
Lithium		100%	-	40%	16%	18%	13%	16%	32%	33%	31%	32%	25%	26%	23%	25%
Molybdenum		100%	-	810%	6%	15%	13%	6%	553%	556%	555%	553%	304%	309%	308%	304%

Notes:
(1) Boron does not have a groundwater protection standard, results are compated to the health-based standard
(2) The groundwater protection standard is equal to the higher of the background tolerance limit and the relevant health-based standard
(3) 32% dilution was minimum dilution predicted in Table 8
(4) 63% dilution was maximum dilution predicted in Table 8
ft = feet
mg/L = milligrams per liter

Prepared by GOL
Checked by PJN
Reviewed by RV

Table 10: Sorption Site and Surface Area Calculations
Monitored Natural Attenuation Evaluation
NIPSCO LLC R. M. Schahfer Generating Station

	Units	Minimum	Mean	Maximum
Ferrihydrite				
Amorphous Iron (Step 3 SEP) + Metal Hydroxide Iron (Step 4 SEP)	Sample Name	SB-18B-32/34	Mean of all samples	SB-53B-25-27
	ppm of Fe	1278	2006	3787
	millimoles of Fe	22.9	35.9	67.8
	moles of Fe	0.0229	0.0359	0.0678
Specific Surface Area	m^2/g	600		
Surface Site Concentration	moles weak sites/ mole of Fe	0.2		
Surface Sites	moles of weak sites	0.00458	0.00719	0.01356
Mass of Ferrihydrite	g	2.03	3.19	6.03
Gibbsite				
Amorphous Aluminum (Step 3 SEP) + Metal Hydroxide Aluminum (Step 4 SEP)	Sample Name	SB-53B-30-32	Mean of all samples	OW-9-10-12
	ppm of Al	130	221	408
	millimoles of Al	4.8	8.2	15.1
	moles of Al	0.0048	0.0082	0.0151
Specific Surface Area	m^2/g	32		
Surface Site Concentration	moles weak sites/ mole of Al	0.41		
Surface Sites	moles of weak sites	0.00198	0.00335	0.00619
Mass of Gibbsite	g	0.38	0.64	1.18

Notes:
ppm = parts per million
m^2/g = meters squared per gram
g = grams

Prepared by: GOL
Checked by: PJN
Reviewed by: RV

Figures



LEGEND

- Assessment Monitoring Well
- Background Monitoring Well
- Downgradient Monitoring Well
- Downgradient Boring Location
- Porewater Sample Location
- CCR Source Material Sample Location
- Generalized Groundwater Flow Direction
- CCR Units
- Approximate Property Line

0 850 1,700

1" = 850 feet

NOTE(S)

1. THIS FIGURE DEPICTS THE GENERALIZED GROUNDWATER FLOW DIRECTION WITHIN THE UPPER PORTION OF THE SURFICIAL AQUIFER.

REFERENCE(S)

1. SERVICE LAYER CREDITS: SOURCES: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AEROGRID, IGN, AND THE GIS USER COMMUNITY

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

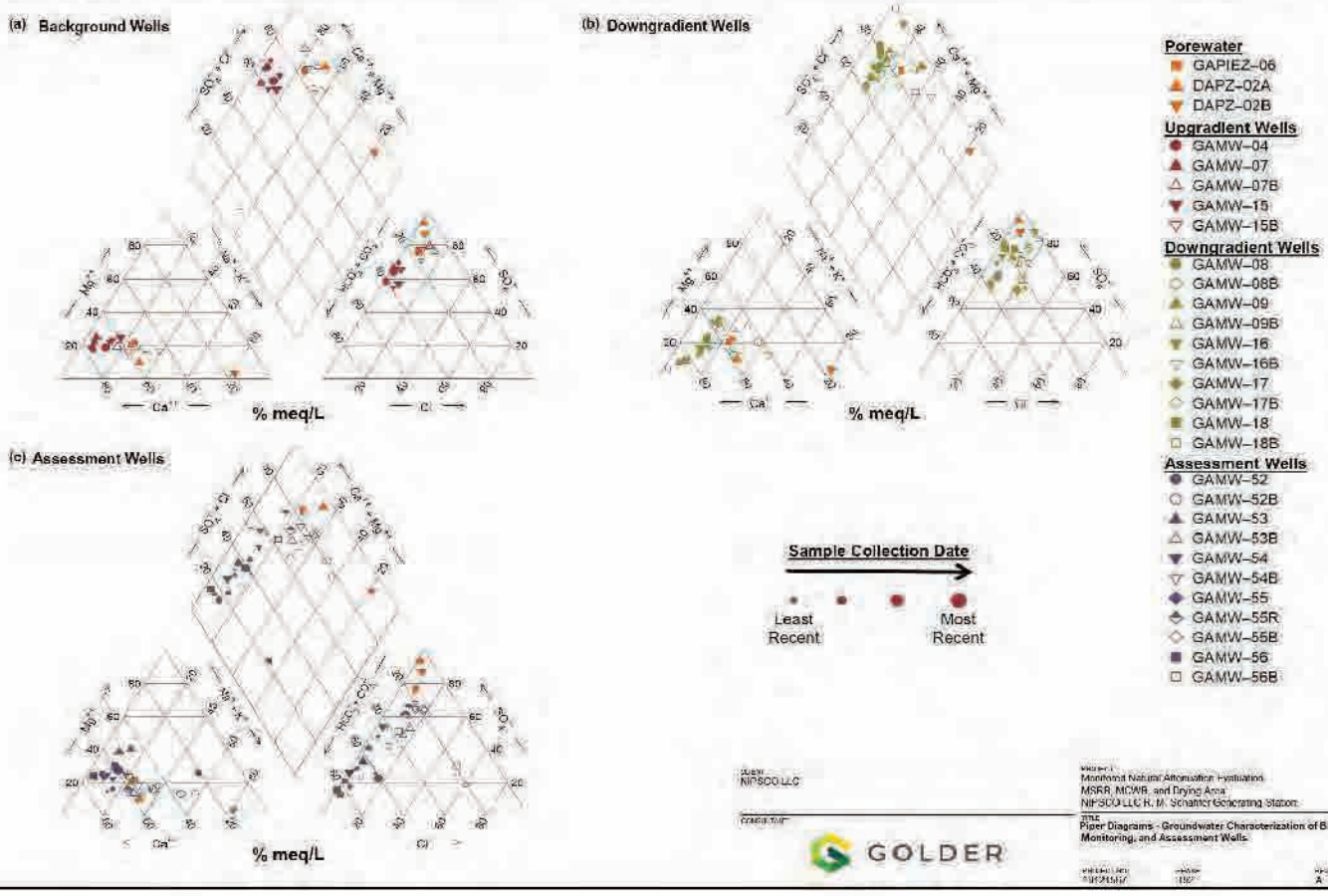
MONITORED NATURAL ATTENUATION EVALUATION
MSRD, MCWD, AND DRYING AREA
MICHIGAN CITY (R. M. SCHAHFER) GENERATING STATION

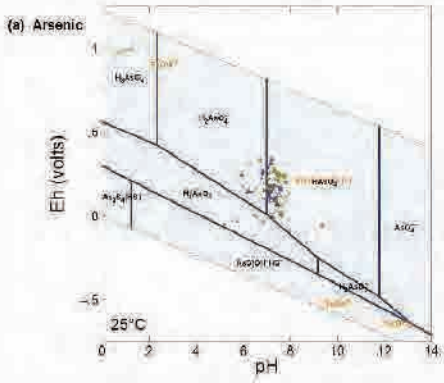
SAMPLE LOCATION MAP

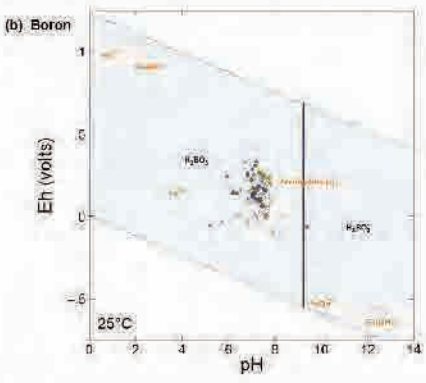
GOLDER

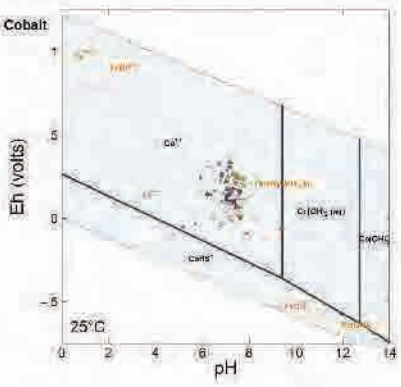
DESIGNED	DFS
APPROVED	MWH

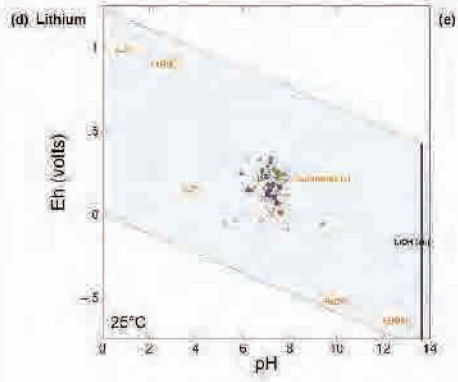
PROJECT NO. 19101587 | CONTROL A | REV. 0 | FIGURE 1

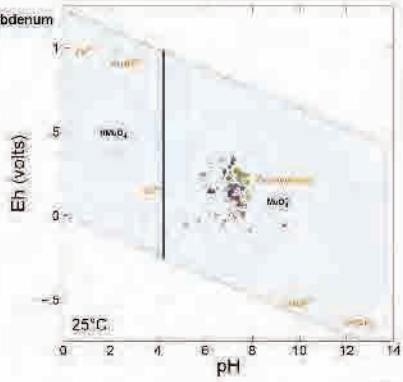

(a) Background Wells
(b) Downgradient Wells
(c) Assessment Wells
% meq/L
Porewater
GAPIEZ-06
DAPZ-02A
DAPZ-02B
Upgradient Wells
GAMW-04
GAMW-07
GAMW-07B
GAMW-15
GAMW-15B
Downgradient Wells
GAMW-08
GAMW-08B
GAMW-09
GAMW-09B
GAMW-16
GAMW-16B
GAMW-17
GAMW-17B
GAMW-18
GAMW-18B
Assessment Wells
GAMW-52
GAMW-52B
GAMW-53
GAMW-53B
GAMW-54
GAMW-54B
GAMW-55
GAMW-55R
GAMW-55B
GAMW-56
GAMW-56B
Sample Collection Date
Least Recent
Most Recent
NIPSCO LLC
GOLDER
Monitored Natural Attenuation Evaluation
MSRR, MCWR, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station
Piper Diagrams - Groundwater Characterization of Background, Monitoring, and Assessment Wells
A
2a-c











Porewater
- GAPIEZ–06
- DAPZ–02A
- DAPZ–02B

Upgradient Wells
- GAMW–04
- GAMW–07
- GAMW–07B
- GAMW–15
- GAMW–15B

Downgradient Wells
- GAMW–08
- GAMW–08B
- GAMW–09
- GAMW–09B
- GAMW–16
- GAMW–16B
- GAMW–17
- GAMW–17B
- GAMW–18
- GAMW–18B

Assessment Wells
- GAMW–52
- GAMW–52B
- GAMW–53
- GAMW–53B
- GAMW–54
- GAMW–54B
- GAMW–55
- GAMW–55R
- GAMW–55B
- GAMW–56
- GAMW–56B

Sample Collection Date

Least Recent → Most Recent

CLIENT
NRG/SCO LLC

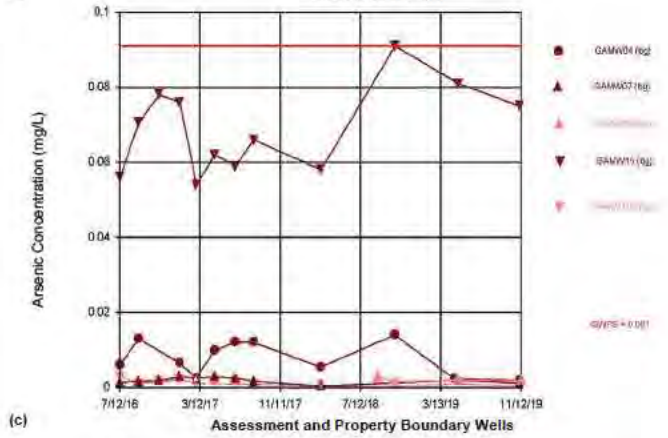
PROJECT
Monitored Natural Attenuation Evaluation
MGWR, MGWR, and Drying Area
NRG/SCO LLC/T.H. Schaefer Generating Station

TITLE
Pourbaix Diagrams For Arsenic, Boron, Cobalt, Lithium, and Molybdenum

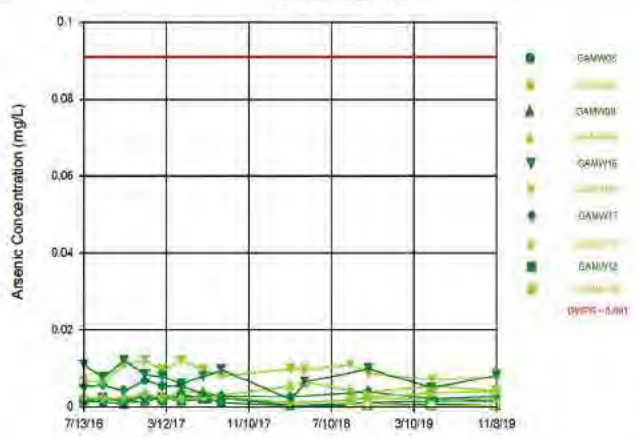
GOLDER

PROJECT NO. 1912165 | REV. 0 | FIG. A | 3a-e

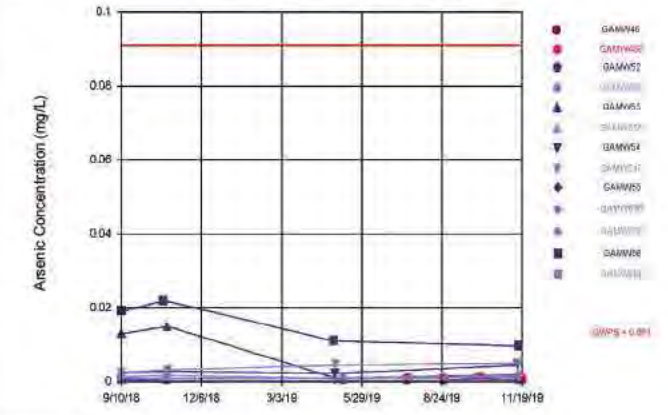
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit.

CLIENT
NIPSCO LLC

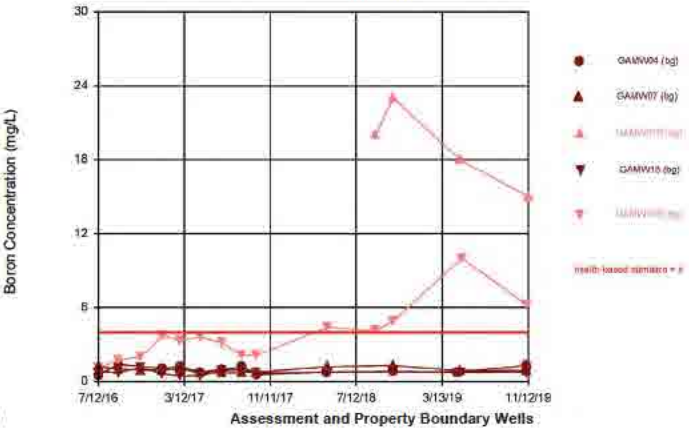
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

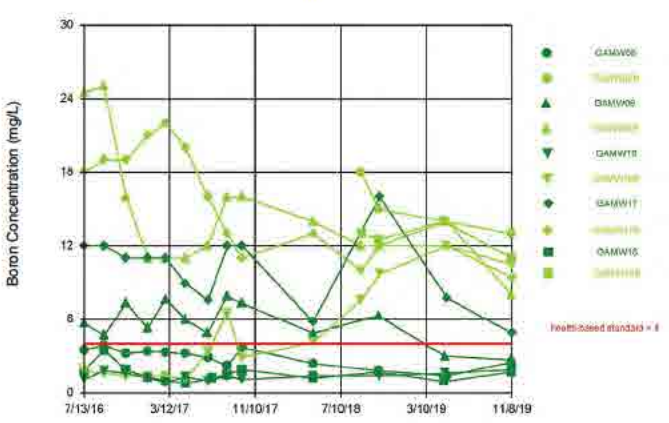
TITLE
Arsenic Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	4a-c

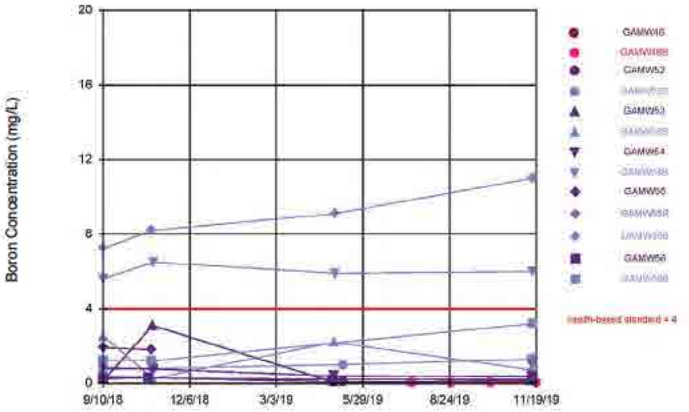
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

CLIENT
NIPSCO LLC

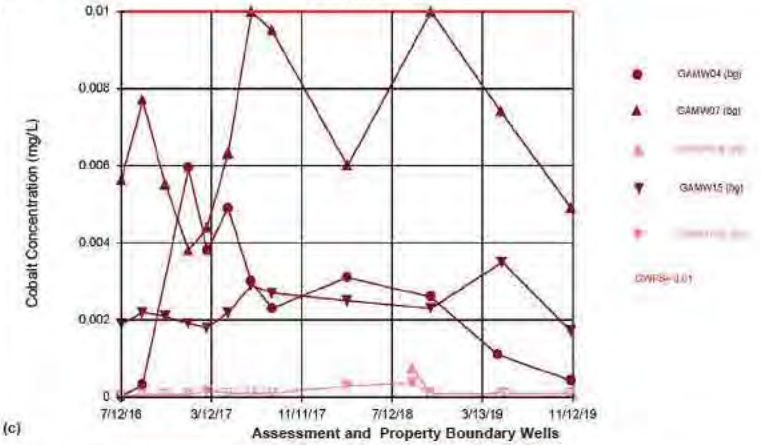
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

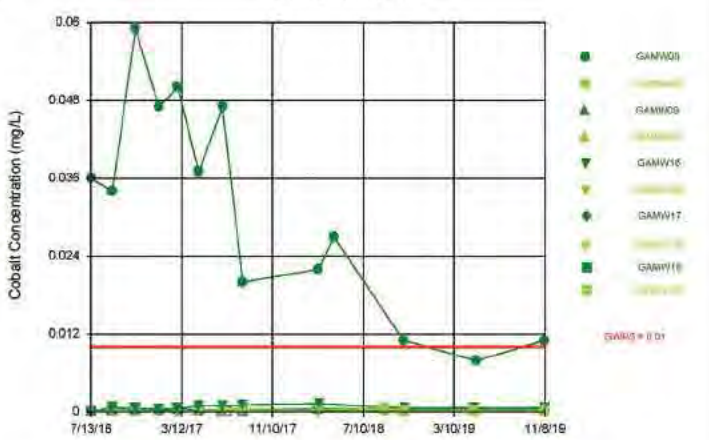
TITLE
Boron Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	5a-c

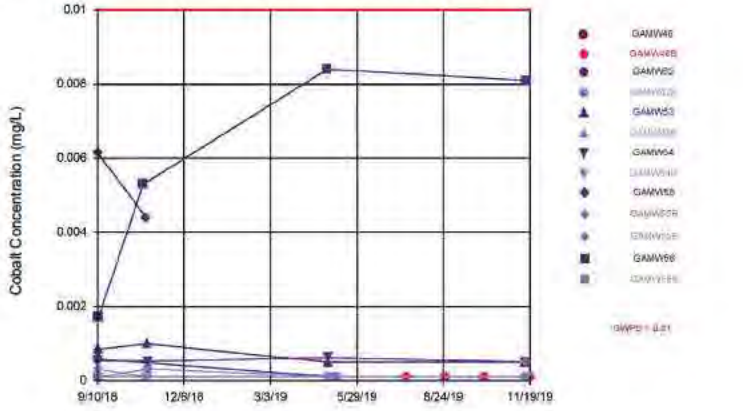
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

CLIENT
NIPSCO LLC

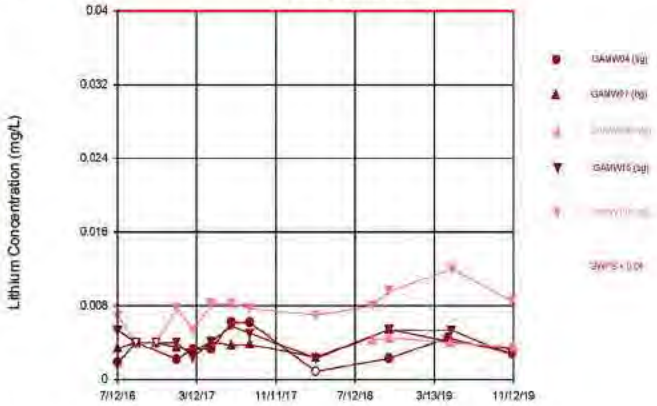
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

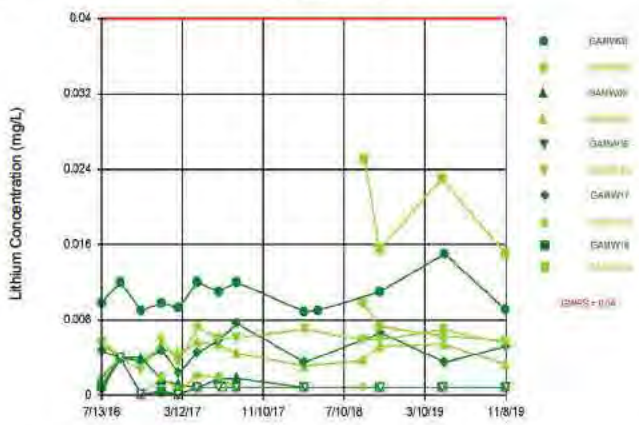
TITLE
Cobalt Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	152	A	6a-c

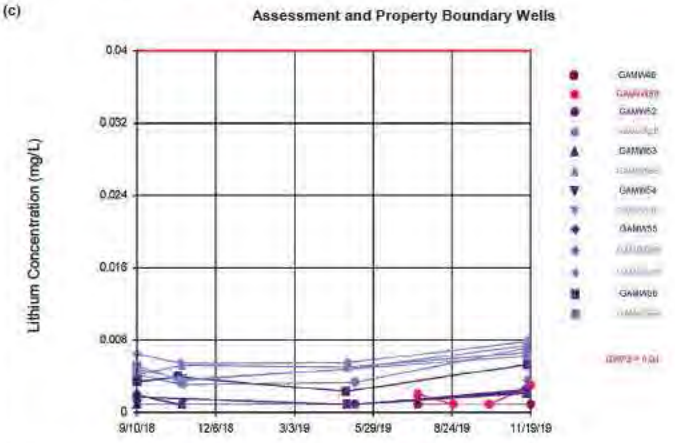
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

CLIENT
NIPSCO LLC

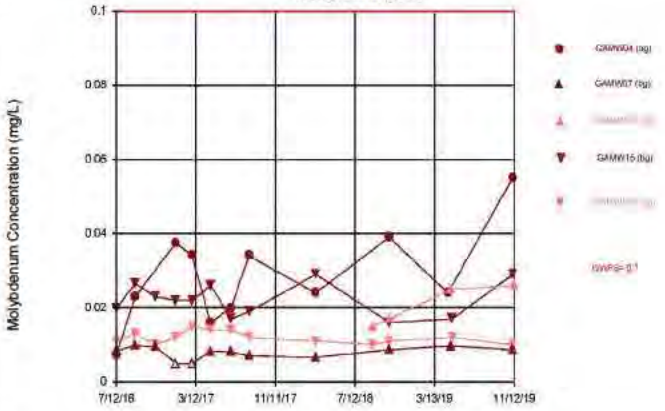
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

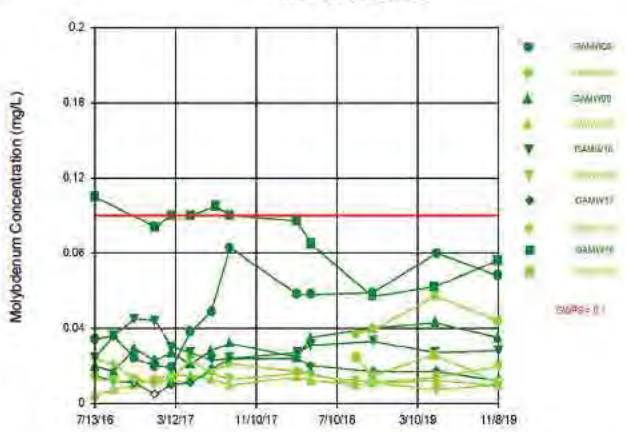
TITLE
Lithium Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	7a-c

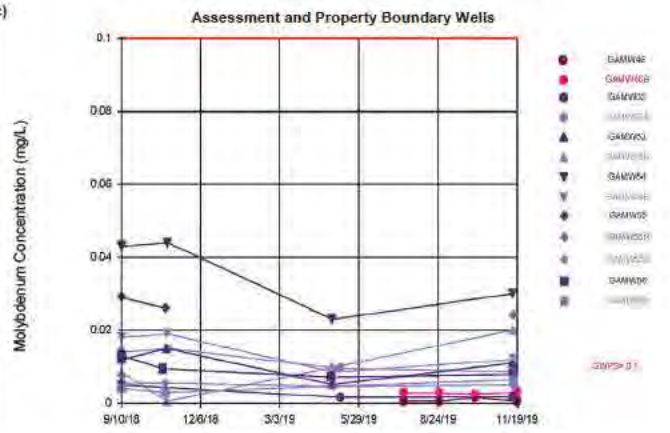
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

CLIENT
NIPSCO LLC

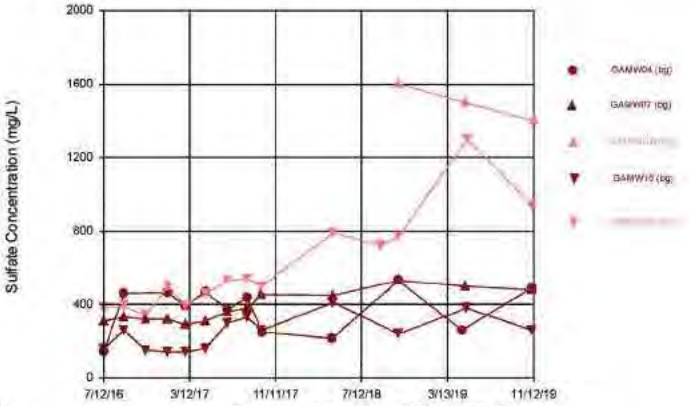
CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

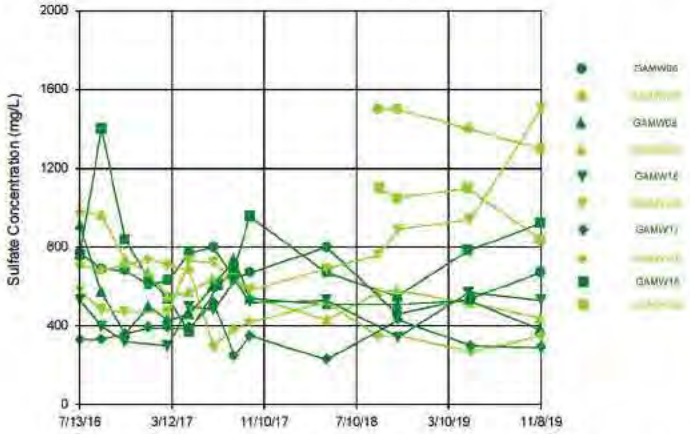
TITLE
Molybdenum Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	8a-c

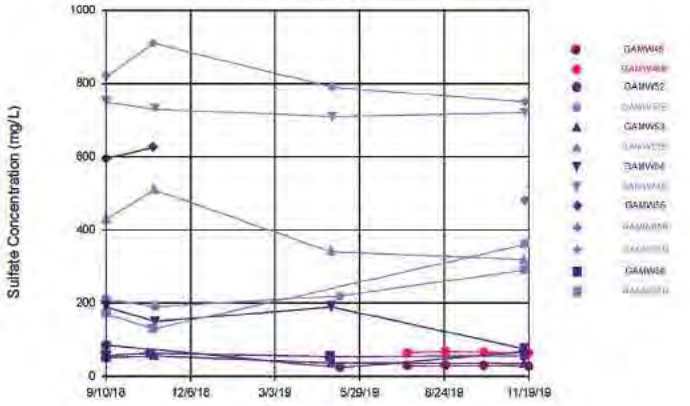
(a)



(b)



(c)



Note: Open symbols reflect sample measurements below the laboratory method detection limit

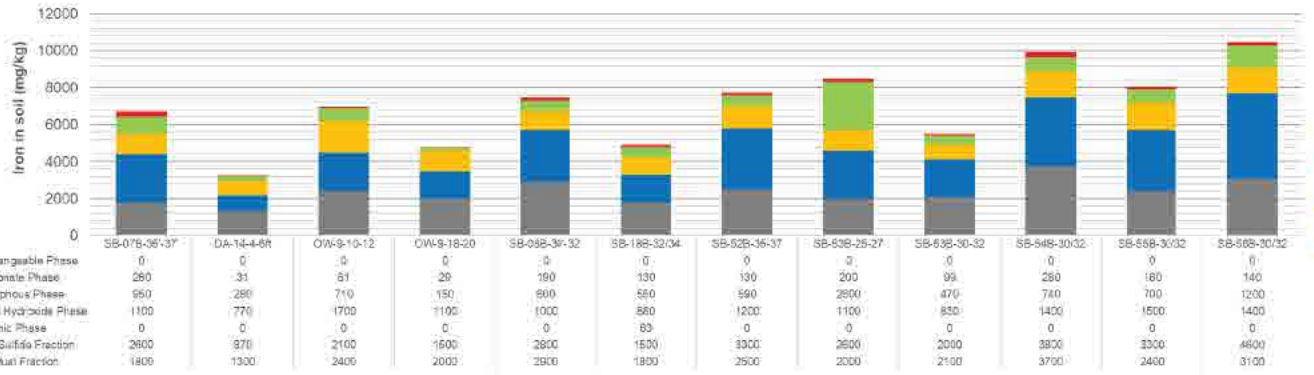
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

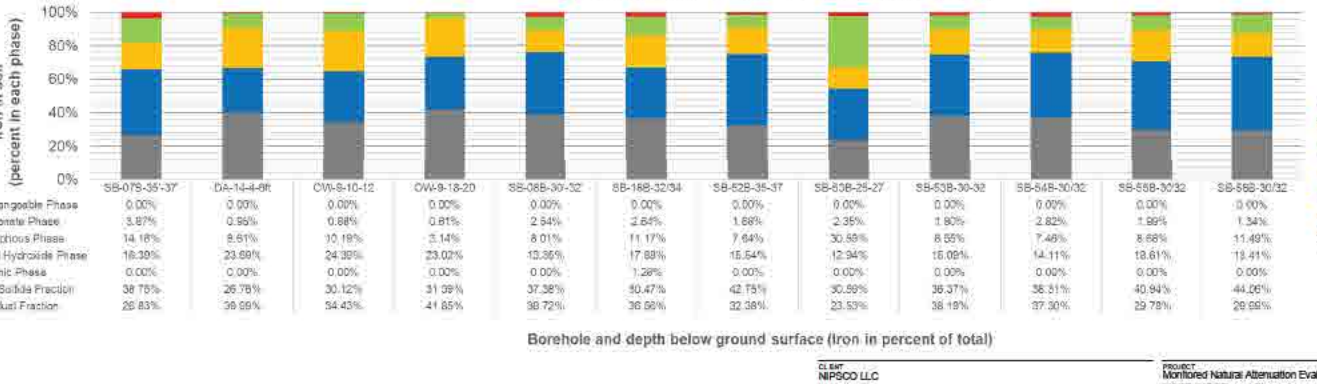
TITLE
Sulfate Time Series for Background, Monitoring, and Assessment and Property Boundary Wells

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	9a-c



	SB-07B-35'-37'	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30'-32	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-56B-30/32
Exchangeable Phase	0	0	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	260	31	61	29	190	130	130	200	99	280	180	140
Amorphous Phase	950	280	710	150	660	550	590	2800	470	740	700	1200
Metal Hydroxide Phase	1100	770	1700	1100	1000	880	1200	1100	850	1400	1500	1400
Organic Phase	0	0	0	0	0	63	0	0	0	0	0	0
Acid/Sulfide Fraction	2600	970	2100	1500	2800	1500	3300	2600	2000	3800	3300	4600
Residual Fraction	1800	1300	2400	2000	2900	1800	2500	2000	2100	3700	2400	3100

Borehole and depth below ground surface (Iron in mg/kg soil)



	SB-07B-35'-37'	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30'-32	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-56B-30/32
Exchangeable Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	3.87%	0.95%	0.88%	0.61%	2.54%	2.64%	1.68%	2.35%	1.80%	2.82%	1.99%	1.34%
Amorphous Phase	14.16%	8.61%	10.19%	3.14%	8.81%	11.17%	7.64%	32.89%	8.55%	7.46%	8.68%	11.49%
Metal Hydroxide Phase	16.39%	23.69%	24.39%	23.02%	13.36%	17.88%	15.54%	12.94%	15.09%	14.11%	18.61%	13.41%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	1.28%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Acid/Sulfide Fraction	38.75%	29.78%	30.12%	31.39%	37.38%	30.47%	42.75%	30.59%	36.37%	36.51%	40.94%	44.06%
Residual Fraction	26.83%	39.99%	34.43%	41.85%	38.72%	36.56%	32.38%	23.53%	38.19%	37.30%	29.79%	29.69%

Borehole and depth below ground surface (Iron in percent of total)

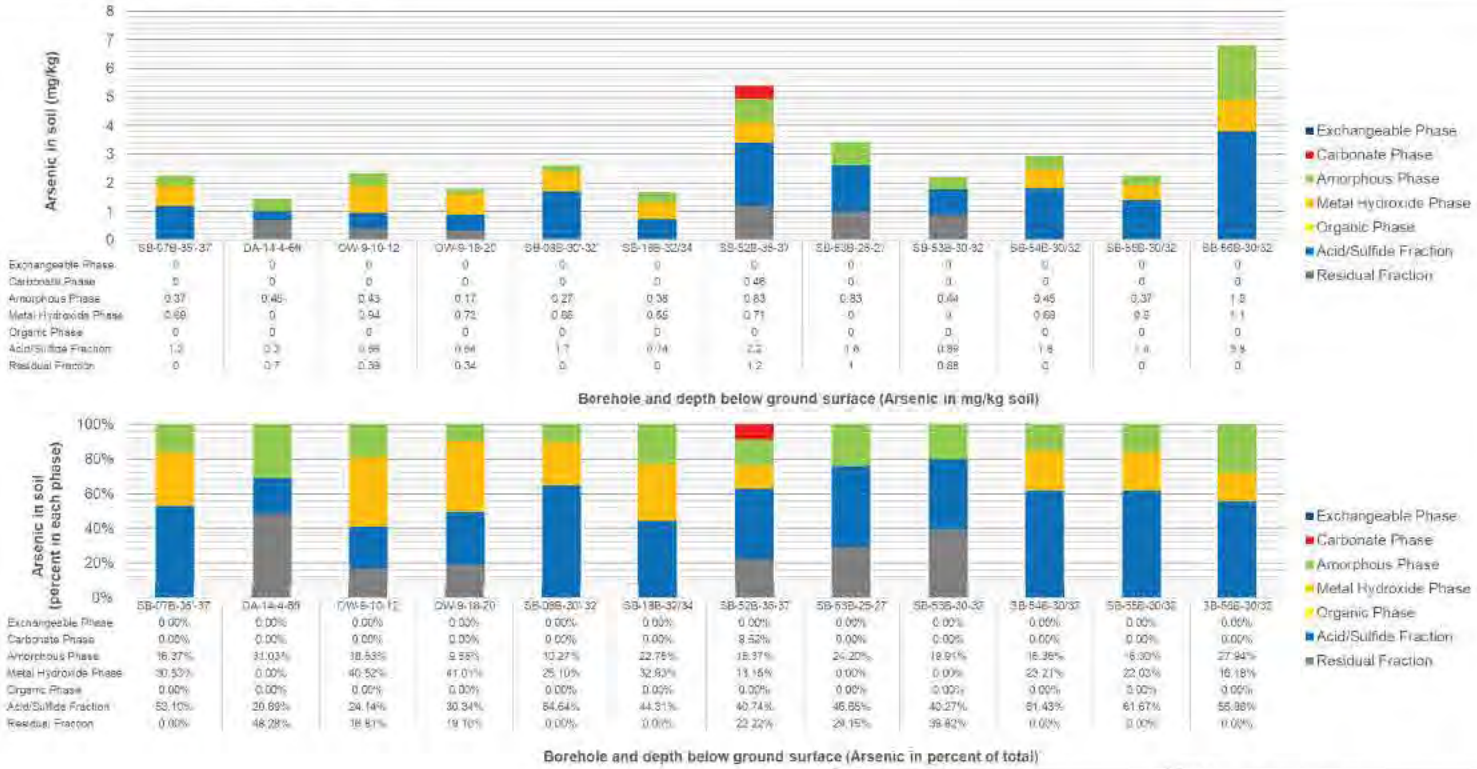
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

TITLE
Iron Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	10



	SB-07B-35/37	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30/32	SB-18B-32/34	SB-52B-35/37	SB-53B-25/27	SB-53B-30/32	SB-54B-30/32	SB-55B-30/32	SB-56B-30/32
Exchangeable Phase	0	0	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	0	0	0	0	0	0	0.46	0	0	0	0	0
Amorphous Phase	0.37	0.46	0.43	0.17	0.27	0.38	0.83	0.83	0.64	0.45	0.37	1.9
Metal Hydroxide Phase	0.69	0	0.94	0.72	0.66	0.55	0.71	0	0	0.69	0.5	1.1
Organic Phase	0	0	0	0	0	0	0	0	0	0	0	0
Acid/Sulfide Fraction	1.2	0.3	0.88	0.84	1.7	0.74	2.2	1.6	0.89	1.8	1.4	3.5
Residual Fraction	0	0.7	0.39	0.34	0	0	1.2	1	0.88	0	0	0

Borehole and depth below ground surface (Arsenic in mg/kg soil)

	SB-07B-35/37	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30/32	SB-18B-32/34	SB-52B-35/37	SB-53B-25/27	SB-53B-30/32	SB-54B-30/32	SB-55B-30/32	SB-56B-30/32
Exchangeable Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	8.52%	0.00%	0.00%	0.00%	0.00%	0.00%
Amorphous Phase	16.37%	31.03%	18.53%	9.55%	10.27%	22.75%	15.37%	24.20%	19.91%	16.36%	16.30%	27.94%
Metal Hydroxide Phase	30.53%	0.00%	40.52%	41.01%	25.10%	32.93%	13.15%	0.00%	0.00%	25.21%	22.03%	16.18%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Acid/Sulfide Fraction	53.10%	20.69%	24.14%	30.34%	64.64%	44.31%	40.74%	46.65%	40.27%	61.43%	61.67%	55.88%
Residual Fraction	0.00%	48.28%	16.81%	19.10%	0.00%	0.00%	22.22%	29.15%	39.82%	0.00%	0.00%	0.00%

Borehole and depth below ground surface (Arsenic in percent of total)

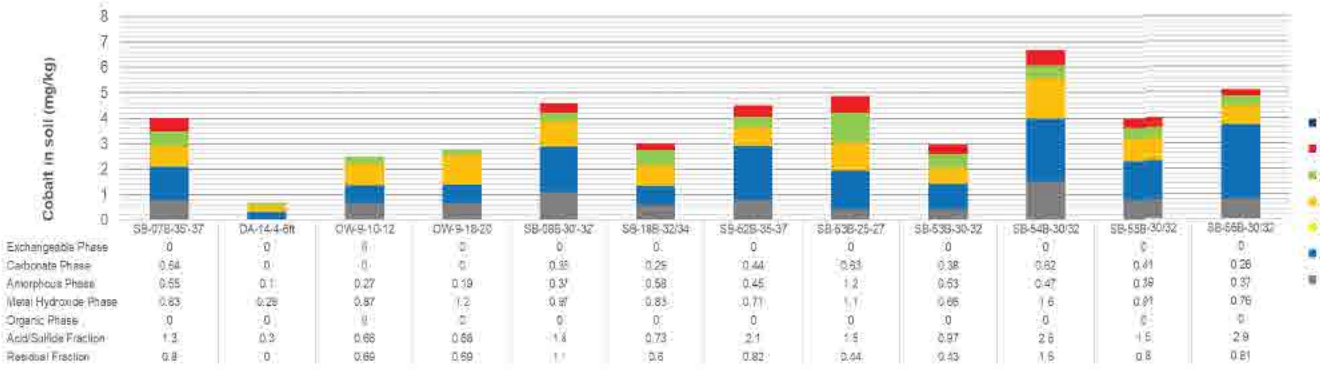
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

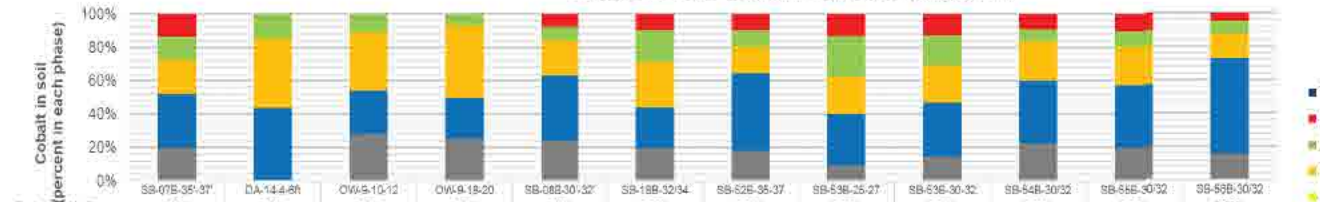
TITLE
Arsenic Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	152	A	11



	SB-07B-35'-37'	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30'-32'	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-55B-30/32
Exchangeable Phase	0	0	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	0.64	0	0	0	0.35	0.25	0.44	0.83	0.38	0.62	0.41	0.26
Amorphous Phase	0.55	0.1	0.27	0.19	0.3'	0.58	0.45	1.2	0.53	0.47	0.39	0.37
Metal Hydroxide Phase	0.83	0.29	0.87	1.2	0.9'	0.83	0.71	1.1	0.66	1.6	0.91	0.76
Organic Phase	0	0	0	0	0	0	0	0	0	0	0	0
Acid/Sulfide Fraction	1.3	0.3	0.68	0.56	1.4	0.73	2.1	1.5	0.97	2.6	1.5	2.9
Residual Fraction	0.8	0	0.69	0.69	1.1	0.6	0.82	0.64	0.43	1.6	0.8	0.81

Borehole and depth below ground surface (Cobalt in mg/kg soil)



	SB-07B-35'-37'	DA-14-4-6ft	OW-9-10-12	OW-9-18-20	SB-08B-30'-32'	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-55B-30/32
Exchangeable Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	13.43%	0.00%	0.00%	0.00%	7.65%	9.57%	9.73%	12.94%	12.79%	9.27%	10.22%	6.10%
Amorphous Phase	13.68%	14.49%	10.84%	6.88%	8.06%	19.14%	9.96%	24.64%	17.85%	7.03%	9.73%	7.25%
Metal Hydroxide Phase	20.85%	42.03%	34.94%	43.48%	21.13%	27.39%	15.71%	22.59%	22.22%	23.92%	22.69%	14.90%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Acid/Sulfide Fraction	32.34%	43.48%	26.51%	24.64%	39.22%	24.09%	46.48%	30.80%	32.66%	37.37%	37.41%	56.86%
Residual Fraction	19.90%	0.00%	27.71%	25.00%	23.97%	18.80%	18.14%	9.03%	14.48%	22.42%	19.95%	15.88%

Borehole and depth below ground surface (Cobalt in percent of total)

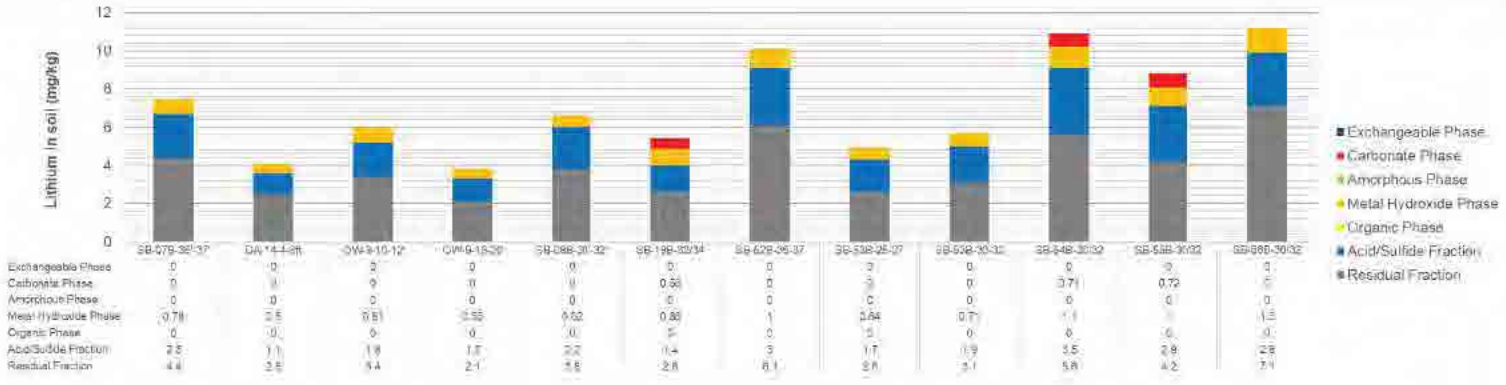
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

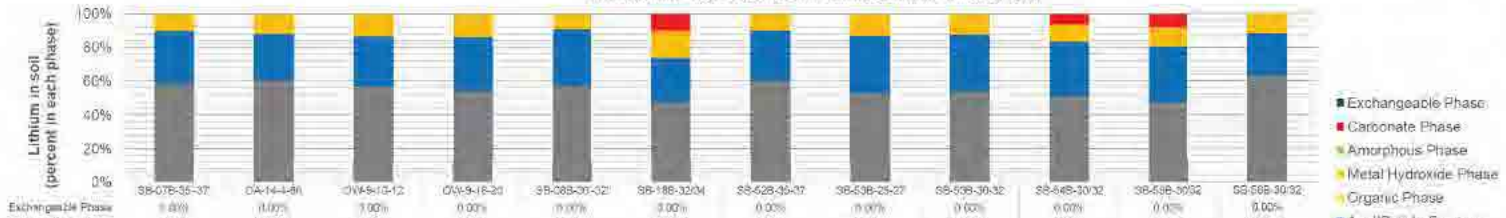
TITLE
Cobalt Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	192	A	12



	SB-07B-35-37	DA-14-4-6ft	OW9-10-12	OW9-18-20	SB-08B-30-32	SB-19B-32/34	SB-62B-35-37	SB-53B-25-27	SB-53B-30-32	SB-64B-30/32	SB-59B-30/32	SB-66B-30/32
Exchangeable Phase	0	0	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	0	0	0	0	0	0.56	0	0	0	0.71	0.72	0
Amorphous Phase	0	0	0	0	0	0	0	0	0	0	0	0
Metal Hydroxide Phase	0.78	0.5	0.51	0.55	0.52	0.89	1	0.84	0.71	1.1	1	1.3
Organic Phase	0	0	0	0	0	0	0	0	0	0	0	0
Acid/Sulfide Fraction	2.8	1.1	1.8	1.5	2.2	1.4	3	1.7	1.9	3.5	2.8	2.8
Residual Fraction	4.4	2.5	3.4	2.1	3.8	2.8	6.1	2.8	3.1	5.8	4.2	7.1

Borehole and depth below ground surface (Lithium in mg/kg soil)



	SB-07B-35-37	DA-14-4-6ft	OW9-10-12	OW9-18-20	SB-08B-30-32	SB-19B-32/34	SB-62B-35-37	SB-53B-25-27	SB-53B-30-32	SB-64B-30/32	SB-59B-30/32	SB-66B-30/32
Exchangeable Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	0.00%	0.00%	0.00%	0.00%	0.00%	10.33%	0.00%	0.00%	0.00%	6.51%	8.16%	0.00%
Amorphous Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Metal Hydroxide Phase	10.43%	12.20%	13.48%	14.29%	9.37%	16.67%	9.90%	12.86%	12.43%	10.09%	11.34%	11.61%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Acid/Sulfide Fraction	38.75%	26.83%	26.25%	31.17%	32.23%	25.83%	29.70%	34.41%	33.21%	32.08%	32.68%	25.00%
Residual Fraction	58.82%	60.98%	56.67%	54.55%	57.40%	47.07%	60.40%	52.63%	54.29%	51.33%	47.02%	63.39%

Borehole and depth below ground surface (Lithium in percent of total)

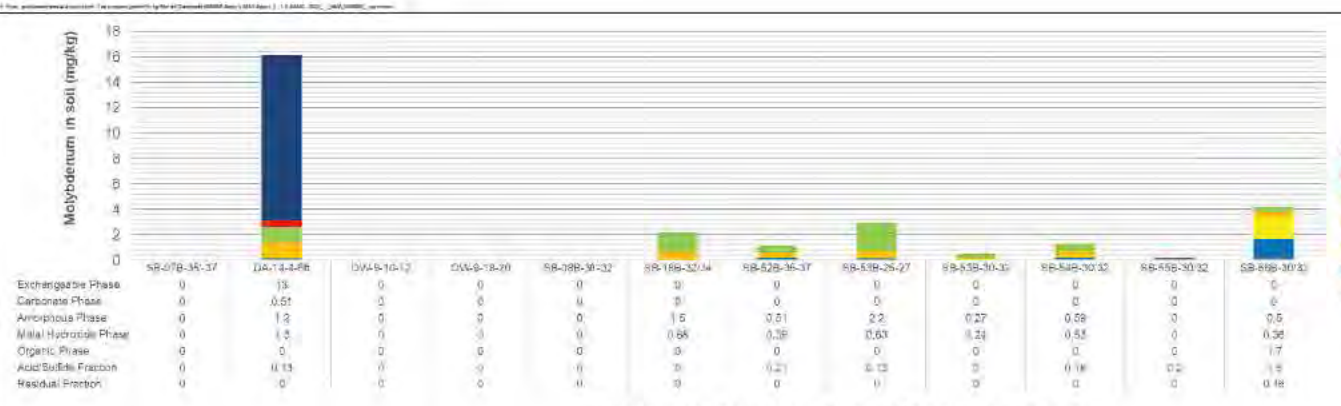
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

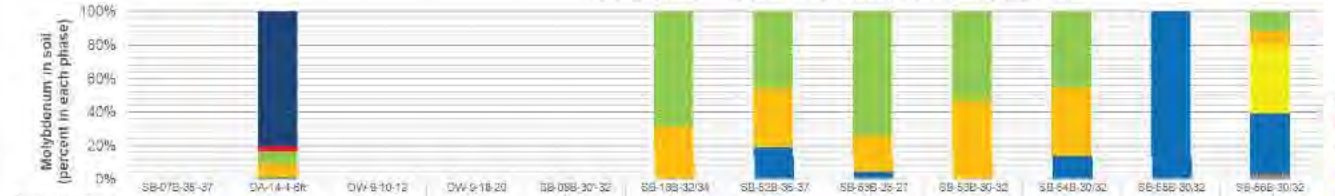
TITLE
Lithium Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	152	A	13



	SB-07B-35-37	DA-14-4-5R	OW-9-10-12	OW-9-18-20	SB-09B-30-32	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-66B-30/32
Exchangeable Phase	0	13	0	0	0	0	0	0	0	0	0	0
Carbonate Phase	0	0.51	0	0	0	0	0	0	0	0	0	0
Amorphous Phase	0	1.2	0	0	0	1.5	0.51	2.2	0.27	0.69	0	0.5
Metal Hydroxide Phase	0	1.5	0	0	0	0.68	0.39	0.63	0.24	0.53	0	0.36
Organic Phase	0	0	0	0	0	0	0	0	0	0	0	1.7
Acid/Sulfide Fraction	0	0.13	0	0	0	0	0.21	0.13	0	0.19	0.2	1.5
Residual Fraction	0	0	0	0	0	0	0	0	0	0	0	0.18

Borehole and depth below ground surface (Molybdenum in mg/kg soil)



	SB-07B-35-37	DA-14-4-5R	OW-9-10-12	OW-9-18-20	SB-09B-30-32	SB-18B-32/34	SB-52B-35-37	SB-53B-25-27	SB-53B-30-32	SB-54B-30/32	SB-55B-30/32	SB-66B-30/32
Exchangeable Phase	0.00%	80.66%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Carbonate Phase	0.00%	3.16%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Amorphous Phase	0.00%	7.43%	0.00%	0.00%	0.00%	68.81%	45.95%	74.32%	52.94%	45.39%	0.00%	11.65%
Metal Hydroxide Phase	0.00%	9.05%	0.00%	0.00%	0.00%	31.19%	35.14%	21.28%	47.06%	46.77%	0.00%	8.53%
Organic Phase	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	40.28%
Acid/Sulfide Fraction	0.00%	0.81%	0.00%	0.00%	0.00%	0.00%	18.92%	4.39%	0.00%	13.85%	100.00%	35.55%
Residual Fraction	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.79%

Borehole and depth below ground surface (Molybdenum in percent of total)

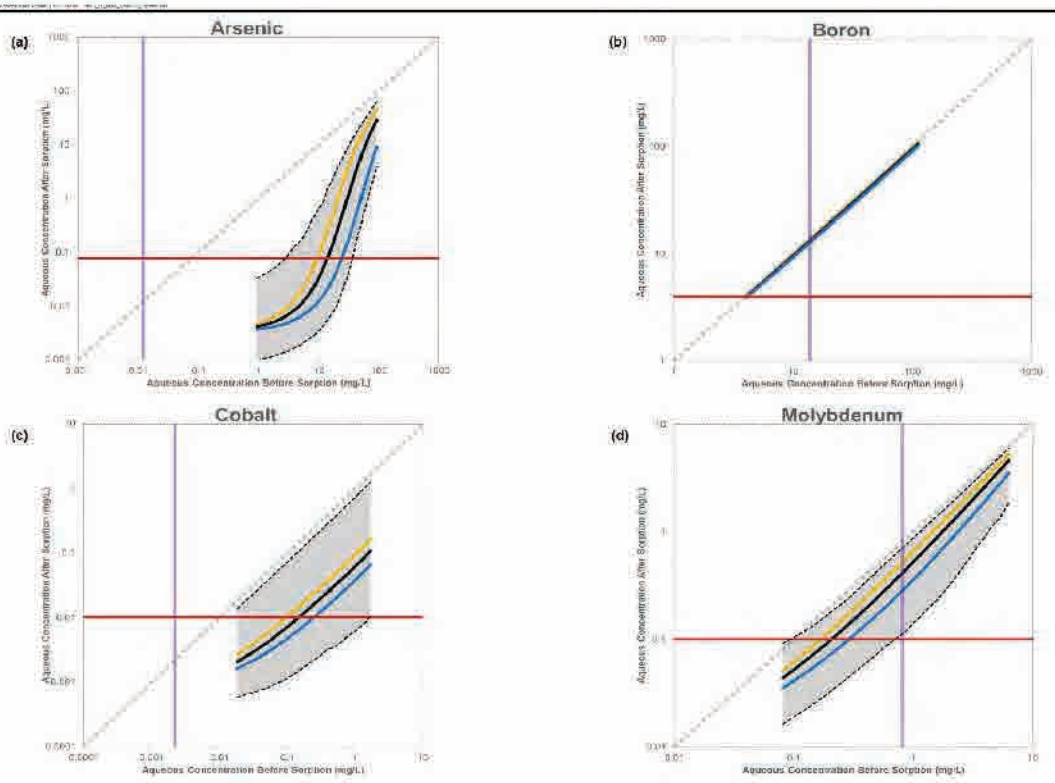
CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

TITLE
Molybdenum Sequential Extraction Results

PROJECT NO.	PHASE	REV.	FIGURE
19121567	152	A	14



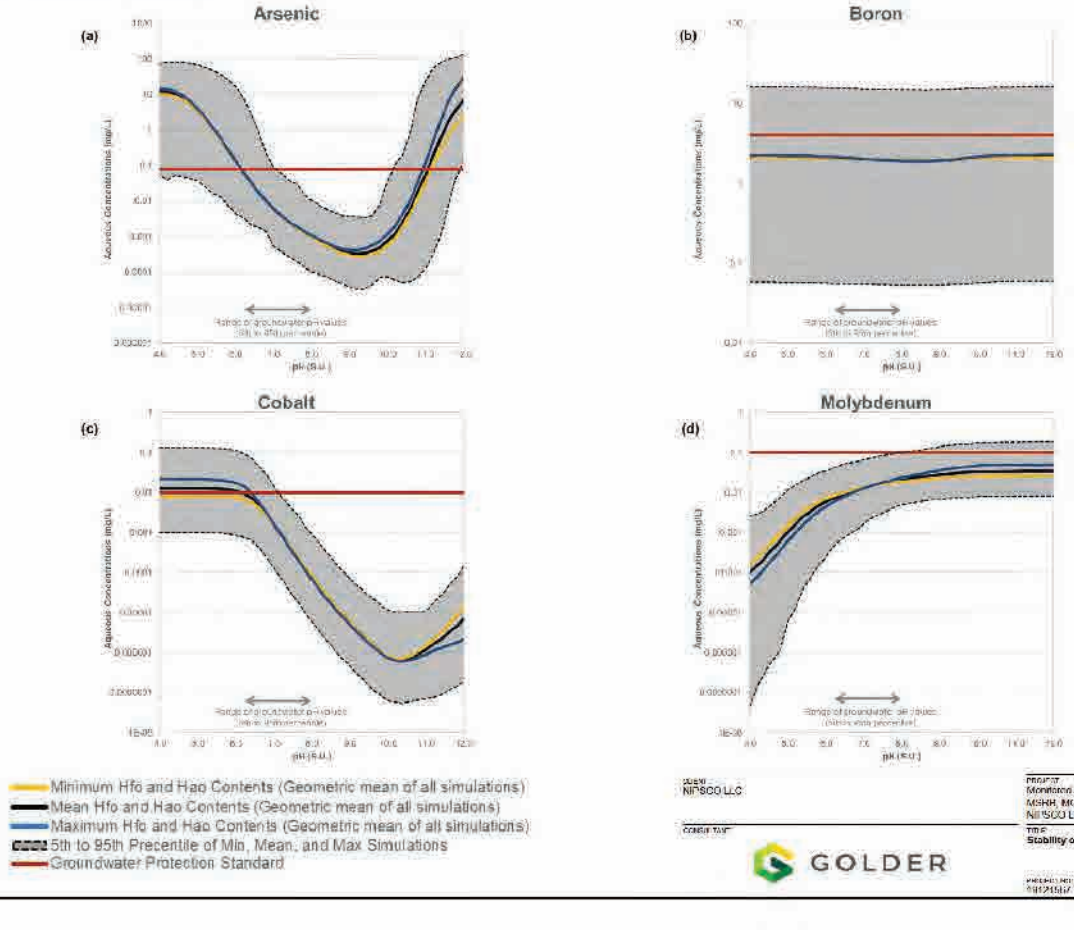
CLIENT
NRGCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSHH, MCWH, and Laying Area
NRGCO LLC R. M. Schahfer Generating Station

TITLE
Capacity of Soils to Adsorb Constituents: Aqueous Concentrations Prior to Equilibrating with Hfo and Hao versus Aqueous Concentrations After Equilibrating

PROJECT NO. 19121557 | PHASE 150 | REV. A | FIGURE 15



CLIENT
NRGCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSWF, IMCWF, and Laying Area
NRGCO LLC/ R. M. Schahfer Generating Station

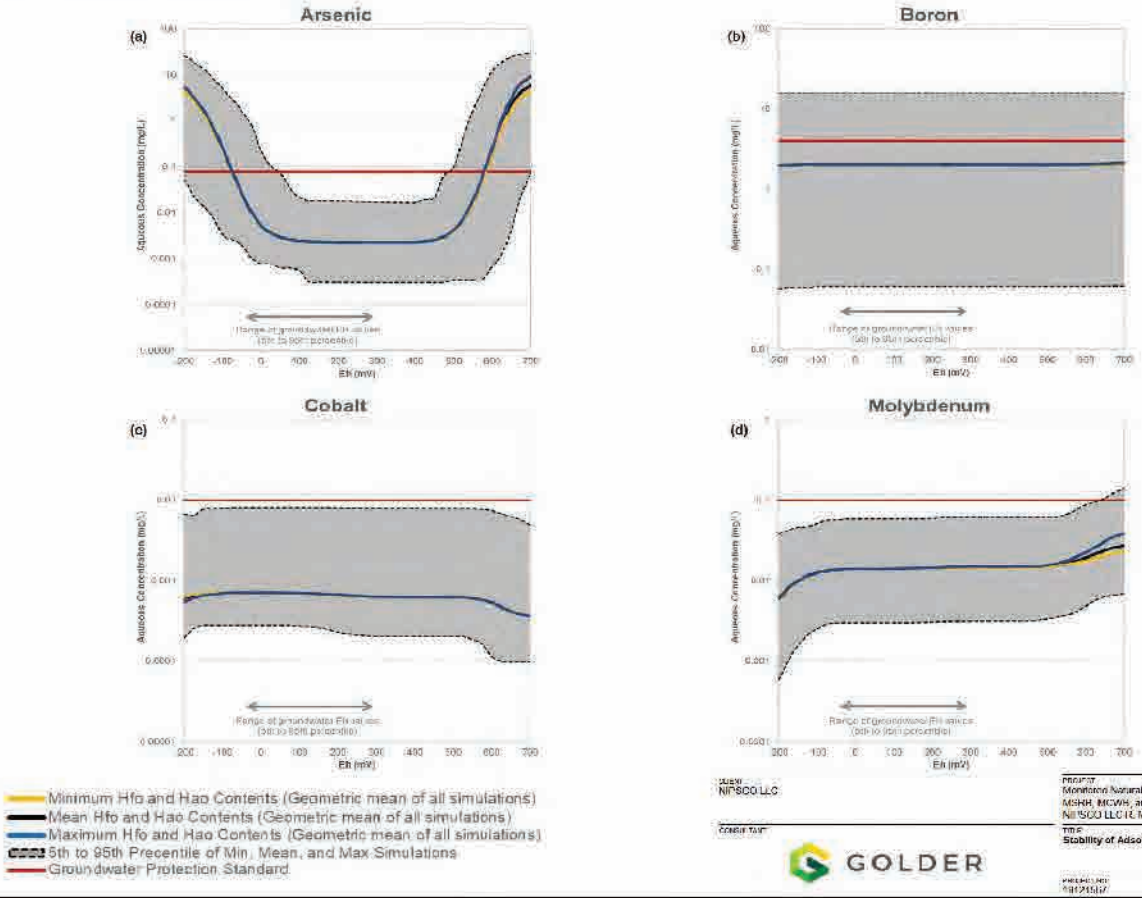
TITLE
Stability of Adsorbed Constituents Versus pH

PROJECT NO.
19121567

PHASE
100

REV.
A

FIGURE
16



CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSWF, IMCWF, and Haying Area
NIPSCO LLC R. M. Schahfer Generating Station

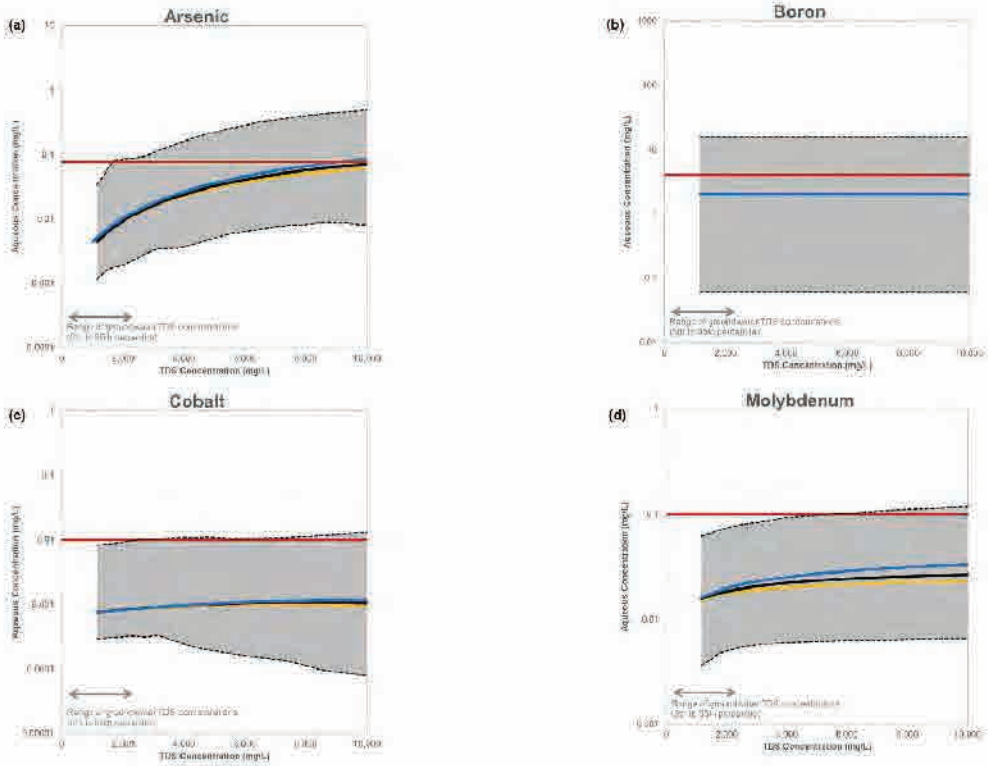
TITLE
Stability of Adsorbed Constituents Versus Eh

PROJECT NO.
19125507

PHASE
150

REV.
A

FIGURE
17



CLIENT
NIPSCO LLC

CONSULTANT
GOLDER

PROJECT
Monitored Natural Attenuation Evaluation
MSWF, MCWF, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station

TITLE
Stability of Adsorbed Constituents Versus TDS

PROJECT NO.
19121560

PHASE
150

REV.
A

FIGURE
18

APPENDIX A

Groundwater and Porewater Monitoring Data

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW04																
Sample Date		2016-07-12	2016-09-08	2016-11-09	2017-01-10		2017-03-01	2017-04-26	2017-06-28	2017-08-22	2017-10-04	2018-03-13		2018-04-20		2018-10-25	2019-04-23	2019-11-07
Samp e Type		N	N	N	FD	N	N	N	N	N	N	FD	N	FD	N	N	N	N
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	0.48	1.4	2.4	1.1	1	1.2	0.74	0.92	1.2	0.54			0.74	0.72	0.78	0.74	1 3
Ca cium	mg/L	110	230	300	270	240	230	220	200	200	140			140	140	210	130	190
Ch oride	mg/L	2.2	27	69	13	14	13	5.4	12	13	4.5			3.7 J	4.4	10	3.7	9 5
Fluoride	mg/L	0.92 J	0 2 J	10 U	0.19 J	0.17 J	5 U	5 U	0.19 J	0.21 J	0.24 J	0.15 J	5 U	5 U	0.17 J-	0.26	0.16 J	0.23
pH	SU	7.22	6.83	6.75		6.93	7 01	6.76	6.88	7.21	7.28		6.95		7 2	6.39	7	7.14
Su fate	mg/L	140 J-	460	480	460	470	390	470	370	440	250			220	210	530	260	490
Total Dissolved Solids	mg/L	420	990	1400	1000	1000	890	870	880	920	610			580 J	580	980	600	900
CCR Appendix IV																		
Ant mony	mg/L	0.002 U	0.002 U	0.00027 J	0.002 U	0.00057 J	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U	0.002 U			0.002 U	0.00065 J	0.00092 J
Arsenic	mg/L	0 0059	0.013	0.0052	0.0058	0.0072	0.005 U	0.0099	0.012	0.012		0.004 J	0.0054			0.014	0.0023 J	0.0018 J
Barium	mg/L	0.041	0.077	0.11	0.095	0.079	0.089	0.069	0.084	0.09		0.11	0.077			0.074	0.068	0.066
Beryllium	mg/L	0 00027 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.00048 J	0.00053 J	0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.00036 J	0.00036 J	0.0052 J	0.002 U	0.002 U	0.002 U	0.002 U		0.0011 J	0.0012 J			0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.00031 J	0.00064 J	0.0061	0.0058	0.0038	0.0049	0.003	0.0023		0.0028	0.0031			0.0026	0.0011	0.00043 J
Fluoride	mg/L	0.92 J	0 2 J	10 U	0.19 J	0.17 J	5 U	5 U	0.19 J	0.21 J	0.24 J	0.15 J	5 U	5 U	0.17 J-	0.26	0.16 J	0.23
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0018 J	0.008 U	0.008 U	0.0021 J	0.0023 J	0.0033 J	0.0033 J	0.0062 J	0.0062 J		0.008 U	0 008 U			0.0023 J	0.0045 J	0.0028 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U	0.0002 U			0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.0075 J	0.023	0.073	0.037	0.038	0.034	0.016	0 02	0.034		0.0048 J	0.024			0.039	0.024	0.055
Radium Total	pci/L	5 U	0.583	0.697	0.804	0.515 U	0.362 U	0.379 U	0.364 U	0.352 U		1.35 J	0.778 J			0.473	0.591	
Radium-226	pci/L	1 U	0.138 U	0.346 U	0.301 U	0.242 U	0.121 U	0.117 U	0.119 J	0.118		0.177	0.0881			0.306	0.311 U	
Radium-228	pci/L	1 U	0.498 U	0.495 U	0.677 J	0.515 U	0.362 U	0.379 U	0.364 U	0.352 U		1.17 J	0.69 J			0.462 U	0.405	
Selenium	mg/L	0.005 U	0.005 U	0.00064 J	0.0017 J	0.0021 J	0.005 U	0.005 U	0.005 U	0.005 U		0.001 J	0.001 J			0.005 U	0.0013 J	0.0052
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0 001 U			0.001 U	0.001 U	0.001 U
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L																	
Alkal nity Carbonate (CO3)	mg/L																	
Alkal nity Hydrox de (OH)	mg/L																	
Alkal nity Total	mg/L															230	190	270
Ferr c Iron	mg/L															6.9		
Ferrous Iron	mg/L															3.1 J		
Iron	mg/L																2.3	0.083 J
Magnesium	mg/L															31	18	31
Manganese	mg/L																0.012 J-	0.0078 J
Nitrate as N	mg/L																0.1 U	0.1 U
Nitrite as N	mg/L																	
Nitrogen Nitrate-Nitrite	mg/L															0.39		
Phosphorus (as phosphate)	mg/L															0.9	0.31 U	0.31 UJ
Potassium	mg/L															3.3 J	3.1 J	3.2 J
Sodium	mg/L															13	12	36
Sample Parameters																		
Dissolved Oxygen	mg/L	0.09	0.58	0.37		1.82	1.47	0.12	0.3	0.52	0.09		0.66		2 3	0.15	7.08	2.55
Oxidation Reduction Potent al	mV	59.6	-24	-6.9		-31.7	14	-57.8	-45	-27	-105.8		-181.8		-81 2	-58.1	19	-60.7
Eh	mV	259.6	176.0	193.1		168.3	214.0	142.2	155.0	173.0	94.2		18.2		118.8	141.9	219.0	139.3
pH	SU	7.22	6.83	6.75		6.93	7.01	6.76	6.88	7.21	7.28		6.95		7 2	6.39	7	7.14
Spec f c Conductance	uS/cm	595	1345	1681		1109	910	1137	911	1153	813		562		770	1311	549	866
Temperature	deg C	13	17.3	16.3		10.5	8 05	10.2	13.1	15.9	16.1		7.55		3 5	15.5	4.2	13.2
Turb dity	NTU	4.04	1.48	2.21		2.28	4 26	4 04	4.88	1.65	0.51		4.92		3.12	1.92	4.48	1.38

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW07															GAMW07B			
Sample Date		2016-07-12	2016-09-08	2016-11-09	2017-01-10	2017-03-01	2017-04-26	2017-06-29	2017-08-23	2017-10-03		2018-03-15	2018-04-23	2018-10-26	2019-05-02	2019-11-08	2018-09-06	2018-10-26	2019-05-02	2019-11-12
Samp e Type		N	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	N	N	N	N
Chemical Name	Un t																			
CCR Appendix I I I																				
Boron	mg/L	1.2	1	0.91	0.91	1	0.68	0.67	0.68	0.71	0.72		1.2	1.3	0.85	0.85	20	23	18	15
Ca cium	mg/L	170	190	200	170	170	190	220	190	220	220		210	230	220	180	370	430	380	400
Ch oride	mg/L	7.8	6.6	5.3	6	7 6	2.8	3 J	3.2 J	3 J	3 6 J		4.7 J	6 3	6 5	4.8	10 U	250	170	150
Fluoride	mg/L	0.72 J	0.91 J	0.8 J	0.85 J	0.66 J	0.76 J	0.79 J	0.66 J	1.1 J	0.93 J	0.58 J	0.57 J	0.73	0.97	0.88	10 U	1.5	1.3	1.2
pH	SU	7.03	7.27	7.04	7.15	7.2	7.17	6.57	7.2		7.1	7.28	7.35	5.71	7.2	7.44	8.29	6.78	7.58	7.13
Su fate	mg/L	310 J-	330	320	320	290	310	360	380	460	450		450	530	500	480	10 U	1600	1500	1400
Total Dissolved Solids	mg/L	770	830	840	750	710	810	970	910	970	1000		900	970	1100	940	2700	2600	920	2300
CCR Appendix IV																				
Ant mony	mg/L	0 00035 J	0.00039 J	0.00035 J	0.00028 J	0.002 U	0 002 U	0 002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0013 J	0.0016 J	0.0018 J	0.0028 J	0.005 U	0.0028 J	0.0025 J	0.0016 J			0.005 U		0.0012 J	0.0019 J	0.0011 J	0.0028 J	0.0015 J	0.0019 J	0.0017 J
Barium	mg/L	0.052	0.055	0.056	0.042	0.05	0.05	0.059	0.059			0.056		0.064	0 053	0.043	0.072	0.063	0.053	0.043
Beryllium	mg/L	0 00011 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 0003 J	0.00022 J			0.001 U		0.00047 J	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.00047 J	0.00046 J	0.002 U	0.002 U	0 002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U
Cobalt	mg/L	0 0056	0.0077	0.0055	0.0038	0.0044	0.0063	0.01	0.0095			0.006		0.01	0.0074	0.0049	0.00074 J	0 001 U	0.001 U	0.001 U
Fluoride	mg/L	0.72 J	0.91 J	0.8 J	0.85 J	0.66 J	0.76 J	0.79 J	0.66 J	1.1 J	0.93 J	0.58 J	0.57 J	0.73	0.97	0.88	10 U	1.5	1.3	1.2
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.0007 J			0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
L thium	mg/L	0.0034 J	0.008 U	0.008 U	0.0035 J	0.0031 J	0.0041 J	0 0037 J	0.0038 J			0.0024 J		0.0054 J	0.0041 J	0.0033 J	0.0043 J	0.0045 J	0.004 J	0.0035 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ			0 0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0.0084 J	0.0098 J	0.0095 J	0.01 U	0.01 U	0.0083 J	0.0081 J	0.007 J			0.0066 J		0.0087 J	0.0097 J	0.0087 J	0.015	0.017	0.025	0.026
Radium Total	pci/L	1 59	0.696	0.548	0.412 U	0.42 U	0.371 U	0.45	0.588			0.749 J		0.823 J	0.37 U		2.63	2 6 J	2.31	
Radium-226	pci/L	0.667 J	0.289	0.374	0.237 U	0.186	0.155	0.232 J	0.3			0.163		0.483 J	0.305 U		1.16	1.56 J	1.17	
Radium-228	pci/L	0.923	0.406	0.462 U	0.412 U	0.42 U	0.371 U	0 262 U	0.413 U			0.585 J		0.365 U	0.37 U		1.47	1.04	1 14	
Selenium	mg/L	0.005 U	0.005 U	0.003 J	0.003 J	0.005 U	0.008	0.0054	0.005			0.0028 J		0.0016 J	0.0045 J	0 0019 J	0.0012 J	0 005 U	0.005 U	0.005 U
Thallium	mg/L	0 00011 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U			0.001 U		0.00024 J	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U
Supplemental Parameters																				
Alkal nity Bicarbonate (HCO3)	mg/L																180			
Alkal nity Carbonate (CO3)	mg/L																5 U			
Alkal nity Hydrox de (OH)	mg/L																5 U			
Alkal nity Total	mg/L													260	270	250	180	180	170	170
Ferr c Iron	mg/L													0.035 J			6.7 J	6.8		
Ferrous Iron	mg/L													0.05 UJ			0.1 R	1.1 J		
Iron	mg/L														0.067 J	0.09 J			5.3	5.5
Magnesium	mg/L													39	41	38	72	87	73	72
Manganese	mg/L														0.46	0.61			0.46	0.49
Nitrate as N	mg/L														3.3	1.6	0.05 R		0.1 U	0.1 U
Nitrite as N	mg/L																0.05 R			
Nitrogen Nitrate-Nitrite	mg/L													0.53				0.049 J		
Phosphorus (as phosphate)	mg/L													0.31 U	0.31 U	0.31 U	0.031 U	0.31 U	0.31 U	0.31 U
Potassium	mg/L													6.6	5.5	6.5	12	13	13	13
Sodium	mg/L													14	14	9.9	290	240	230	120
Sample Parameters																				
Dissolved Oxygen	mg/L	0.6	1.81	0.59	0.52	0.51	1.96	1.02	0 84		0.48	0.8	3.52	2.64	0.81	0.38	0.13	0.67	0.19	0.2
Oxidation Reduction Potential	mV	111.2	64.2	-6.4	71.3	65.3	76.9	291.1	8.5		95.4	-55	-98.7	-233.3	135.1	-131.8	-197.6	-230.2	34.9	-196.7
Eh	mV	311.2	264.2	193.6	271.3	265.3	276.9	491.1	208.5		295.4	145.0	101.3	-33.3	335 1	68.2	2.4	-30.2	234.9	3.3
pH	SU	7.03	7.27	7.04	7.15	7.2	7.17	6.57	7.2		7.1	7.28	7.35	5.71	7.2	7.44	8.29	6.78	7.58	7.13
Spec f c Conductance	uS/cm	966	1072	1106	928	832	1121	1151	1157		1273	760	1060	1240	975	828	5178	3237	2357	1686
Temperature	deg C	14.4	19.2	16.7	12.9	10.63	11.8	14.6	16.5		18	10	10	16.95	10.3	15.3	15.03	13.86	12.4	12.9
Turb dity	NTU	4.6	4.51	1.26	3.2	4.76	2.17	2.87	0.9		0.49	1.3	1.75	1.08	2.72	4.58	4.48	3.01	2.86	1.11

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW08														GAMW08B					
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-04	2018-03-14	2018-04-23	2018-10-26	2019-05-08	2019-11-07	2018-09-07		2018-10-26		2019-05-03	2019-11-07
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	N	N	N	FD	N	FD	N	N	N
Chemical Name	Un t																				
CCR Appendix I I I																					
Boron	mg/L	3.5	3.9	3.2	3.4	3 3	3.2	2.9	2.2	3.7		2.4	1.8	1.4	2 5		18		15	14	13
Ca cium	mg/L	310	310	300	260	270	310	340	270	290		360	230	250	280		380		370	350	340
Ch oride	mg/L	88	71	89	99	110	86	83	39	87		64	56	49	66		240		180	160	180
Fluoride	mg/L	1 J	1 2 J	0.73 J	0.87 J	0.94 J	0.92 J	1.3 J	2 J	0.68 J	1 2 J	1.3 J-	1.6	2 2	1.9		1.6 J		1.5	1.9	1.7
pH	SU	6.92	7.03	6.85	7.02	7.09	6.93	7	7 27	6 89	7.41	7.41	6.99	7.37	7.5		7.7		7.45	7.57	7.85
Su fate	mg/L	770 J-	690	680	610	630	770	800	640	670		800	460	540	670		1500		1500	1400	1300
Total Dissolved Solids	mg/L	1600	1500	1600	1300	1400	1700	2000	1400	1500		1700	1100	1300	1300		1900 J		2300	2300	2200
CCR Appendix IV																					
Ant mony	mg/L	0 00073 J	0.00069 J	0.0014 J	0.00041 J	0.00043 J	0 002 U	0.00059 J	0.00075 J		0.002 U		0.00082 J	0.00076 J	0.00077 J		0.002 U		0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0018 J	0.0019 J	0.0018 J	0.0027 J	0.0016 J	0.0031 J	0 0027 J	0.0023 J		0.005 U		0.0011 J	0.0015 J	0.0016 J		0.005 U		0.005 U	0.005 U	0.005 U
Barium	mg/L	0.068	0.065	0.065	0.05	0 055	0.064	0.074	0.077		0.066	0.069	0.053	0.058	0.066		0.042		0.03	0 025	0 023
Beryllium	mg/L	0 00017 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.0004 J	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Cadmium	mg/L	7.4E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.00037 J	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.00029 J	0.002 U	0 002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.036	0.034	0.059	0.047	0.05	0.037	0.047	0.02		0.022	0.027	0.011	0.0079	0.011		0.00066 J		0.001 U	0.001 U	0.001 U
Fluoride	mg/L	1 J	1 2 J	0.73 J	0.87 J	0.94 J	0.92 J	1.3 J	2 J	0.68 J	1 2 J	1.3 J-	1.6	2 2	1.9		1.6 J		1.5	1.9	1.7
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
L thium	mg/L	0 0098	0.012	0.009	0.0098	0.0093	0.012	0.011	0.012		0 0089	0 009	0.011	0.015	0.0091		0.0098		0.0073 J	0.0063 J	0.0058 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U		0.0002 U	0.0002 U	0.0002 U		0.0002 U		0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.034	0.036	0.024	0.02	0 019	0.038	0.049	0.083		0.058	0.058	0.059	0.08	0.068		0.037		0.039	0 057	0 044
Radium Total	pci/L	1 07	1 08	1.09	0.581	0.777	0.632	1.11	0.762		1.13 J	0.99	1 J	0.473			1.67 J		1 02 J	0 704	
Radium-226	pci/L	0.501 J	0.469	0.557	0.375	0 368	0.383	0 613 J	0.591		0.267	0.437	0.582 J	0.312 U			1.09 J		0.596 J	0.438	
Radium-228	pci/L	1 U	0.609	0.533	0.43 U	0.423 U	0 365 U	0.499	0.341 U		0.865 J	0.552	0.423	0.456 U			0.579		0.454 U	0.518 U	
Selenium	mg/L	0.005 U	0.0065	0.0033 J	0.0014 J	0.0032 J	0.011	0.0088	0.0081		0.024	0.022	0.0021 J	0.016	0.0036 J		0 0014 J		0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.00045 J	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Supplemental Parameters																					
Alkal nity Bicarbonate (HCO3)	mg/L															160	160				
Alkal nity Carbonate (CO3)	mg/L															5 U	5 U				
Alkal nity Hydrox de (OH)	mg/L															5 U	5 U				
Alkal nity Total	mg/L												350	380	380	160	160	160	160	130	160
Ferr c Iron	mg/L												0.083 J			6.1 J	6.9 J	6 5	6.2		
Ferrous Iron	mg/L												0.05 UJ			0.1 R	0.1 R	0.79 J	0.98 J		
Iron	mg/L													0.2 U	0.2 U					5.6	5.1
Magnesium	mg/L												44	53	56	58	66	63	62	45	42
Manganese	mg/L													0.22	0.37					0.49	0.45
Nitrate as N	mg/L													7.7	0.25	0 05 R	0.05 R			0.075 J	0.43
Nitrite as N	mg/L															0 05 R	0.05 R				
Nitrogen Nitrate-Nitrite	mg/L												0.06					0.05 U	0 05 U		
Phosphorus (as phosphate)	mg/L												0.31 U	0.15 J	0.11 J-	0.028 J	0.031 U	0.31 U	0 31 U	0.31 U	0.19 J-
Potassium	mg/L												12	13	12	5.6	6.4	5 5	5.5	5.6	5.3
Sodium	mg/L												45	45	51	260	300	200	200	240	200
Sample Parameters																					
Dissolved Oxygen	mg/L	1.9	0.38	1.62	1.27	0.96	0.63	1.96	0.93	0 21	0.97	5.09	0.21	0.44	4.2		0.42		0.12	0.13	2.61
Oxidation Reduction Potential	mV	159.7	64.6	-8	58.4	49.9	60.4	242.5	61.9	-15.9	110.1	-106.4	27.7	62.2	44.1		-185.5		-67	7.9	-67
Eh	mV	359.7	264.6	192.0	258.4	249.9	260.4	442.5	261.9	184.1	310.1	93.6	227.7	262.2	244.1		14.5	200.0	133.0	207.9	133.0
pH	SU	6.92	7.03	6.85	7.02	7.09	6.93	7	7.27	6 89	7.41	7.41	6.99	7.37	7.5		7.7		7.45	7.57	7.85
Spec f c Conductance	uS/cm	1925	1807	1664	1517	1494	2098	1834	1713	1840	1121	1732	1440	1102	1322		2538		2375	2190	1896
Temperature	deg C	15 5	18.78	17.75	12.2	10.06	11.1	15.8	18.5	18.3	9.6	10.2	17.2	11	10.84		14.6		14.5	12.8	8.05
Turb dity	NTU	2.3	3.22	0.58	1.26	1.56	1.1	2.41	0 68	4 38	1.11	1.54	1.4	1.81	0.31		3.4		1.63	1.72	2.89

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nepheloметric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.
UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW09																
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-01		2017-04-26		2017-06-28	2017-08-23	2017-10-03	2018-03-14	2018-04-23	2018-10-25	2019-05-02		2019-11-07
Samp e Type		N	N	N	N	FD	N	FD	N	N	N	N	N	N	N	FD	N	N
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	5.7	4.7	7.3	5.3	7.7	7.6	5.9	6.1	4.9	7.9	7.3		4.9	6.3	3	3	2.7
Ca cium	mg/L	320	240	210	210	200	200	220	240	270	280	220		220	220	200	200	150
Ch oride	mg/L	63	55	58	58	75	73	71	67	53	39	64		58	82	46	46	39
Fluoride	mg/L	0.15 J	10 U	10 U	0.22 J	0.13 J	0.14 J	0 16 J	0.13 J	0.18 J	2 J	0.21 J	5 U	0.26 J-	0.28	0.27	0 27	0.33
pH	SU	7.27	7.25	7.12	6.68		7.44		7.15	7.25	7.31	7.3	7.28	6.87	6 88		7.1	7.06
Su fate	mg/L	910 J-	570	360	500	440	420	460	460	600	740	540		510	510 J-	530	530	380
Total Dissolved Solids	mg/L	1500	1100	880	980	1000	990	1000	960	1300	1400	1100		930	1100	970	980	770
CCR Appendix IV																		
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0 002 U	0.002 U	0.002 U		0 002 U		0.002 U	0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0015 J	0.0013 J	0.00076 J	0.0031 J	0.005 U	0 005 U	0.0028 J	0.0029 J	0.002 J	0.0027 J		0 005 U		0.005 U	0.005 U	0.005 U	0.005 U
Barium	mg/L	0.059	0.043	0.036	0.039	0.035	0.037	0.039	0.042	0 047	0.054		0.041	0.039	0.039	0.041	0.041	0.036
Beryllium	mg/L	0 00012 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00036 J	0 001 U	0.001 U	0.001 U		0 001 U		0.00092 J	0.00058 J	0.00052 J	0.00049 J
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.00033 J	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0 0036	0.002 U	0.00062 J	0.0013 J	0.002 U	0 002 U	0.002 U	0 002 U	0.0011 J	0.0015 J		0 0016 J		0.002 U	0.0012 J	0.0012 J	0.002 U
Cobalt	mg/L	0.001 U	0.00018 J	0.0002 J	0.0002 J	0.001 U	0 001 U	0.00029 J	0.00025 J	0.001 U	0.001 U		0 001 U		0.00038 J	0.00049 J	0.00055 J	0.00035 J
Fluoride	mg/L	0.15 J	10 U	10 U	0.22 J	0.13 J	0.14 J	0 16 J	0.13 J	0.18 J	2 J	0.21 J	5 U	0.26 J-	0.28	0.27	0 27	0.33
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.001 U	0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0019 J	0.008 U	0.008 U	0.0016 J	0.0011 J	0 0012 J	0.008 U	0 008 U	0.0017 J	0.0018 J		0 008 U		0.008 U	0.008 U	0.008 U	0.008 U
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.02	0.017	0.029	0.023	0.027	0.027	0.021	0.021	0 028	0 032		0.025	0.035	0.04	0.043	0.043	0.035
Radium Total	pci/L	1.5	0.568	0.477 U	0.467 U	0.55	0.469	0.593	0.414	0 707	0 803		1.45 J	0.096	0.679	0.505	0.427 U	
Radium-226	pci/L	0.506 J	0.231	0.397 U	0.257	0.134	0.166	0.194	0.205	0.255 J	0 357		0.188	0.204	0.446	0.33	0.355 U	
Radium-228	pci/L	0.994	0.349 U	0.477 U	0.467 U	0.427 U	0.432 U	0.398	0.36 U	0.452	0.446		1.26 J	-0.108	0.361 U	0.428 U	0.427 U	
Selenium	mg/L	0.014	0.0091	0.0049 J	0.011	0.014	0.014	0.019	0.02	0 013	0 027		0.0082	0.011	0 0098	0.012	0.012	0.0077
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 001 U	0.001 U	0.001 U		0 001 U		0.001 U	0.001 U	0.001 U	0.001 U
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L																	
Alkal nity Carbonate (CO3)	mg/L																	
Alkal nity Hydrox de (OH)	mg/L																	
Alkal nity Total	mg/L														150	110	100	110
Ferr c Iron	mg/L														0.042 J			
Ferrous Iron	mg/L														0.05 UJ			
Iron	mg/L															0.027 J	0.038 J	0.037 J
Magnesium	mg/L														21	21	19	16
Manganese	mg/L															0.011 J	0.013 J	0.0083 J
Nitrate as N	mg/L															5 6	5.6	7.1
Nitrite as N	mg/L																	
Nitrogen Nitrate-Nitrite	mg/L														1.4			
Phosphorus (as phosphate)	mg/L														0.31 U	0.31 U	0.31 U	0.31 UJ
Potassium	mg/L														9	7 2	7.1	5.6
Sodium	mg/L														38	35	33	28
Sample Parameters																		
Dissolved Oxygen	mg/L	3.59	6.69	1.98	6.1		3.41		3.92	5.27	3.24	5.98	6.71	5.43	0 22		5.82	5.54
Oxidation Reduction Potential	mV	-1.4	75.7	27.6	236		90.5		152.6	280.8	58.9	139.5	-116.3	-90.8	-48.8		53.6	-25.7
Eh	mV	198.6	275.7	227.6	436.0		290.5		352.6	480.8	258.9	339.5	83.7	109.2	151.2		253.6	174 3
pH	SU	7.27	7.25	7.12	6.68		7.44		7.15	7.25	7.31	7 3	7.28	6.87	6 88		7.1	7.06
Spec f c Conductance	uS/cm	1671	736	1110	822		1041		1209	702	1542	1331	600	1156	1274		888	685
Temperature	deg C	14.4	18.4	16.9	11.9		10.75		11.9	14.7	17.2	18.2	10.2	10.6	17.9		11.4	15.9
Turb dity	NTU	1.59	3.92	1.15	1.34		3.12		1.88	1.91	0.91	0.39	0.82	2.44	2.41		3.41	1.55

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW09B																		
Sample Date		2016-07-13		2016-09-08	2016-11-09	2017-01-10	2017-03-01	2017-04-26	2017-06-28	2017-08-23		2017-10-03	2018-03-14	2018-04-23	2018-09-06	2018-10-26	2019-05-08		2019-11-07
Samp e Type		FD	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	FD	N	N
Chemical Name	Un t																		
CCR Appendix I I I																			
Boron	mg/L	24	25	25	16	11	11	11	12	16	16	16		14	12	12		14	8
Ca cium	mg/L	260	280	270	190	200	170	170	180	180	180	160		160	150	180		150	150
Ch oride	mg/L	210	180	190	130	110	120	130	150	170	160	140		150	180	150		140	110
Fluoride	mg/L	0.54 J	0.55 J	0.67 J	0.68 J	0.1 J	1.3 J	1.2 J	1.4 J	1.2 J	0.37 J	1.5 J	1.4 J	1.6 J	1.8 J	1.6		1.6	1.5
pH	SU		7.08	7.15	6.96	7.36	7.44	7 29	7.36		7.46	7.36	7.56	7.43	7 32	7.46		7.49	7.56
Su fate	mg/L	970 J-	1000 J-	960	740	670 J	550	570	640	630	650	550		430	570	580		520	440
Total Dissolved Solids	mg/L	2100	2000	2100	1700	1300	1200	1200	1500	1500	1500	1300		990	1300	1200		1200	990
CCR Appendix IV																			
Ant mony	mg/L	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0 002 U		0.002 U	0.002 U		0.002 U	0.002 U
Arsenic	mg/L	0.0024 J	0.0026 J	0.002 J	0.0014 J	0 0027 J	0.005 U	0.004 J	0.004 J	0.0031 J	0.0031 J		0.0054	0.0064	0.0044 J	0 004 J		0.0057	0.0042 J
Barium	mg/L	0 069	0.071	0.076	0.062	0.048	0.04	0.046	0.055	0.062	0.058		0.045	0.04	0.049	0.047		0.041	0 029
Beryllium	mg/L	0.00012 J	9.1E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0 001 U		0.001 U	0.001 U		0.001 U	0.001 U
Cadmium	mg/L	0.00027 J	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0 001 U		0.001 U	0.001 U		0.001 U	0.001 U
Chromium	mg/L	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0 002 U		0.002 U	0.002 U		0.002 U	0.002 U
Cobalt	mg/L	0 001 U	0 001 U	0.00069 J	0.00028 J	0.00045 J	0.001 U	0 00028 J	0 00045 J	0.00041 J	0.00041 J		0 001 U		0.00058 J	0.00028 J		0.00025 J	0.001 U
Fluoride	mg/L	0.54 J	0.55 J	0.67 J	0.68 J	0.1 J	1.3 J	1.2 J	1.4 J	1.2 J	0.37 J	1.5 J	1.4 J	1.6 J	1.8 J	1.6		1.6	1.5
Lead	mg/L	0 001 U	0 001 U	0.001 U	0.00017 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0 001 U		0.001 U	0.001 U		0.001 U	0.001 U
L thium	mg/L	0.0055 J	0.0065 J	0.008 U	0.008 U	0 0049 J	0.0045 J	0.0056 J	0.0054 J	0.0047 J	0.0042 J		0.0031 J		0.0037 J	0.0052 J		0.0055 J	0.0033 J
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U		0.0002 U	0.0002 U
Molybdenum	mg/L	0.01 U	0.0079 J	0.0075 J	0.0097 J	0.013	0.015	0.015	0.013	0.0094 J	0.01		0.014	0.012	0.01	0.011		0.012	0.0096 J
Radium Total	pci/L	1.12	1.86	1.65	1.14	0.453	1.09	0.774	1 85	1.01	1.27		1.18 J	0.868	1.04	1.24 J		1.01	
Radium-226	pci/L	0.809 J	0.947 J	0.907	0.579	0.476	0.585	0.316	0.781 J	0.585	0.709		0.482	0.301	0.653	0.69 J		0.449	
Radium-228	pci/L	1 U	0.913	0.743	0.559	0.41 U	0.508	0.458	1 07	0.422	0.563		0.699 J	0.567	0.386	0.546		0.564	
Selenium	mg/L	0 005 U	0 005 U	0.005 U	0.005 U	0.002 J	0.005 U	0.0014 J	0.001 J	0.0015 J	0.0016 J		0 005 U		0.002 J	0.0019 J		0.005 U	0.0011 J
Thallium	mg/L	0.0003 J	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0 001 U		0.001 U	0.001 U		0.0002 J	0.001 U
Supplemental Parameters																			
Alkal nity Bicarbonate (HCO3)	mg/L														190				
Alkal nity Carbonate (CO3)	mg/L														5 U				
Alkal nity Hydrox de (OH)	mg/L														5 U				
Alkal nity Total	mg/L														190	200	200	200	170
Ferr c Iron	mg/L														2.5 J	2.1			
Ferrous Iron	mg/L														0.1 R	0.55 J			
Iron	mg/L																3 2	3.2	3
Magnesium	mg/L														57	60	64	63	54
Manganese	mg/L																1 2	1.2	1 2
Nitrate as N	mg/L														0.05 R		0.1 U	0.1 U	0.12
Nitrite as N	mg/L														0.05 R				
Nitrogen Nitrate-Nitrite	mg/L															0.077			
Phosphorus (as phosphate)	mg/L														0.09	0.31 U	0.31 U	0.31 U	0.31 UJ
Potassium	mg/L														4 J	3.8 J	4 J	4 J	2.4 J
Sodium	mg/L														150	94	110	110	46
Sample Parameters																			
Dissolved Oxygen	mg/L		0.44	1.06	0.43	0.38	0.44	0 61	0.71		0.57	0.45	0.1	0.04	0 61	0.28		0.04	0.35
Oxidation Reduction Potential	mV		-57.7	67.3	-76.4	-100.1	-80.6	-102.6	68 2		19.7	-46 8	-121.6	-130.5	-100.5	-101 1		-16.8	-131.8
Eh	mV		142.3	267.3	123 6	99.9	119.4	97.4	268.2		219.7	153 2	78.4	69.5	99 5	98.9		183.2	68.2
pH	SU		7.08	7.15	6.96	7.36	7.44	7 29	7.36		7.46	7.36	7.56	7.43	7 32	7.46		7.49	7.56
Spec f c Conductance	uS/cm		2356	2435	2088	1559	1352	1592	1561		1922	1722	1053	1301	1556	1693		1165	9.24
Temperature	deg C		14.1	14.7	15.1	13.6	13.45	14.5	14 8		15.5	16	14	14.4	16.1	16		14.2	14.4
Turb dity	NTU		3.48	4.29	2.17	0.99	2.58	1 88	1.69		2.54	1.96	4.18	4.11	2.96	1.39		4.7	3.36

Notes:
CCR = coal combustion res dual
mg/L = m illigrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.
UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW15														
Sample Date		2016-07-13	2016-09-08		2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-03	2018-03-15	2018-04-24	2018-10-26	2019-05-06	2019-11-08
Samp e Type		N	FD	N	N	N	N	N	N	N	N	N	N	N	N	N
Chemical Name	Un t															
CCR Appendix I I I																
Boron	mg/L	0 75	0.45 J	1 J	1.1	0.6	0.44	0.45	0 87	0.91	0.66		0.72	0.76	0.71	0.73
Ca cium	mg/L	100	130	120	100	82	81	95	160	150	77		170	120	140	100
Ch oride	mg/L	28	31	31	27	28	27	27	27	25	19		24	21	22	28
Fluoride	mg/L	1.2 J	0.85 J	0.85 J	0 74 J	0.8 J	0.77 J	0.74 J	0.82 J	0.82 J	0.93 J	0.67 J	0.76 J	0.69	0.52	0.73
pH	SU	6.88		6.98	6.83	6.96	6.99	6.76	6.61	6.96	6.88	6.95	6.89	5.2	7.1	7 34
Su fate	mg/L	160 J-	260	260	150	140	140	160	300	330	260		410	240	380	260
Total Dissolved Solids	mg/L	570	660	630	520	400	400	420	780	750	660		790	5900	740	640
CCR Appendix IV																
Ant mony	mg/L	0.002 U	0.00041 J	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.056	0.072	0 069	0.078	0.076	0.054	0.062	0.059	0.066		0 058		0.091	0.081	0.075
Barium	mg/L	0.044	0.053	0 053	0.039	0.032	0.031	0.034	0.054	0.058		0.047		0.046	0.047	0.037
Beryllium	mg/L	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0 002 U	0.002 U	0.00027 J	0.00028 J	0.00029 J	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0 0019	0.0022	0.0022	0.0021	0.0019	0.0018	0.0022	0 0029	0.0027		0.0025		0.0023	0.0035	0.0017
Fluoride	mg/L	1.2 J	0.85 J	0.85 J	0.74 J	0.8 J	0.77 J	0.74 J	0.82 J	0.82 J	0.93 J	0.67 J	0.76 J	0.69	0.52	0.73
Lead	mg/L	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0053 J	0 008 U	0.008 U	0.008 U	0.004 J	0.0024 J	0.0041 J	0.0058 J	0.005 J		0.0023 J		0 0054 J	0.0053 J	0.0027 J
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0 02	0.027	0 026	0.023	0.022	0.022	0.026	0.017	0.019		0 029		0.016	0.017	0.029
Radium Total	pci/L	5 U	0.479	0 513	0.646 U	0.555 J	0.339 U	0.463 U	0.335	0.342 U		0.657 J		0.858 J	0.476 U	
Radium-226	pci/L	1 U	0.202	0.145	0.337 U	0.38	0.127 U	0.1	0.0965 J	0.104		0.0617		0.527 J	0.28 U	
Radium-228	pci/L	1 U	0 397 U	0.382 U	0.646 U	0.401 U	0 339 U	0.463 U	0.278 U	0.342 U		0.576 J		0.407 U	0.476 U	
Selenium	mg/L	0.005 U	0 005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U	0.005 U	0.005 U		0.005 U		0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U
Supplemental Parameters																
Alkal nity Bicarbonate (HCO3)	mg/L															
Alkal nity Carbonate (CO3)	mg/L															
Alkal nity Hydrox de (OH)	mg/L															
Alkal nity Total	mg/L													180	180	170
Ferr c Iron	mg/L													4.3		
Ferrous Iron	mg/L													5.2 J		
Iron	mg/L														11	5.4
Magnesium	mg/L													24	30	24
Manganese	mg/L														0.089	0.055
Nitrate as N	mg/L														0.1 U	0.1 U
Nitrite as N	mg/L															
Nitrogen Nitrate-Nitrite	mg/L													0.05 U		
Phosphorus (as phosphate)	mg/L													4	1.4	1.3
Potassium	mg/L													2.6 J	3.2 J	3.3 J
Sodium	mg/L													24	32	30
Sample Parameters																
Dissolved Oxygen	mg/L	0.48		0.48	0.14	0.25	0.16	0.19	1	0.32	0.29	0.06	0.02	1.97	0.15	0.12
Oxidation Reduction Potential	mV	-79.2		-60.1	-111	-114.3	-104.1	-104.4	-46.9	-43.7	-13.8	-56.8	-99.1	-254.7	-27.5	-100
Eh	mV	120.8		139.9	89.0	85.7	95.9	95 6	153.1	156.3	186.2	143.2	100.9	-54.7	172.5	100.0
pH	SU	6.88		6.98	6.83	6.96	6.99	6.76	6.61	6.96	6.88	6.95	6.89	5.2	7.1	7.34
Spec f c Conductance	uS/cm	779		909	733	594	584	674	9.32	1004	901	581	933	855	730	598
Temperature	deg C	15 3		20.3	19.9	14.6	12.1	11 6	14.6	16.6	18.1	10.8	10.6	17.1	8.3	15.8
Turb dity	NTU	4.48		2.96	3.41	3.98	4.4	4.92	4.2	3.1	4.11	3.98	4.29	3.1	4.9	6.9

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW158																
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-03	2018-03-15	2018-04-24	2018-09-06		2018-10-26	2019-05-08	2019-11-08	
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	FD	N	N	N	FD	N
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	1.1	1.7	2	3.7	3.3	3.6	3.1	2.1	2.1		4.4		4.1	4.9	10		6.2
Ca cium	mg/L	160	160	160	180	160	170	190	170	73		230		200	210	280		280
Ch oride	mg/L	52	58	62	81	64	65	71	64	64		87		89	93	110		80
Fluoride	mg/L	0.65 J	0.62 J	0.46 J	0.74 J	0.77 J	0.75 J	0.72 J	0.61 J	0.5 J	0.69 J	0.79 J		0.6 J	0.6	0.84 J		0.89
pH	SU	7.81	7.49	7.04	7.52	7.48	7.11	7.26	7 37	7.42	7.45	7.36		7.8	6.74	7.43		7.57
Su fate	mg/L	380 J-	390	340	500	390	460	530	540	500		790		720	770	1300		940
Total Dissolved Solids	mg/L	830	800	840	1000	890	980	1200	1100	1100		1400		1400	1400	2100		1600
CCR Appendix IV																		
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U			0.002 U	0 002 U	0.002 U		0.002 U
Arsenic	mg/L	0.003 J	0.0011 J	0.0014 J	0.0022 J	0.0011 J	0.00098 J	0.00084 J	0.00081 J		0.005 U			0.005 U	0 005 U	0.00088 J		0.005 U
Barium	mg/L	0.054	0.053	0.056	0.056	0 051	0.052	0.064	0.069		0.068			0.07	0.064	0.081		0.054
Beryllium	mg/L	7 8E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0.001 U	0 001 U	0.001 U		0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0.001 U	0 001 U	0.001 U		0.001 U
Chromium	mg/L	0 00062 J	0.002 U	0.002 U	0.00033 J	0.00034 J	0 002 U	0 002 U	0.002 U		0.002 U			0.002 U	0 002 U	0.002 U		0.002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.00016 J	0 001 U	0 001 U	0.001 U		0 00029 J			0 00037 J	0 001 U	0.001 U		0.001 U
Fluoride	mg/L	0.65 J	0.62 J	0.46 J	0.74 J	0.77 J	0.75 J	0.72 J	0.61 J	0.5 J	0.69 J	0.79 J		0.6 J	0.6	0.84 J		0.89
Lead	mg/L	0.001 U	0.001 U	0.00023 J	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U			0.001 U	0 001 U	0.001 U		0.001 U
L thium	mg/L	0.0069 J	0.008 U	0.008 U	0.0077 J	0.0053 J	0.0082	0.0082	0.0077 J		0.007 J			0.008	0.0096	0.012		0.0085
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U			0.0002 U	0.0002 U	0.0002 U		0 0002 U
Molybdenum	mg/L	0.011	0.013	0.01	0.012	0 015	0.014	0.014	0.012		0.011			0.01	0.011	0.012		0.01
Radium Total	pci/L	1 26	0.594	0.61	1.14 J	0.876	0.687	0.789	0.872		1.69 J			1.31	1.51 J	1.61		
Radium-226	pci/L	0.607 J	0.442	0.361 U	0.785	0.441	0.442	0.537 J	0.547		0.752			0.711	0.837 J	1.07		
Radium-228	pci/L	1 U	0.389 U	0.498 U	0.502 U	0.435	0.378 U	0 329 U	0.363 U		0.94 J			0.603	0.676	0.544		
Selenium	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U		0.005 U			0.0017 J	0 005 U	0.005 U		0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U			0.001 U	0 001 U	0.0003 J		0.001 U
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L												180	180				
Alkal nity Carbonate (CO3)	mg/L												5 U	5 U				
Alkal nity Hydrox de (OH)	mg/L												5 U	5 U				
Alkal nity Total	mg/L												180	180	200	200	180	180
Ferr c Iron	mg/L												2 J	2.1 J	1.8			
Ferrous Iron	mg/L												0.1 R	0.1 R	0.38 J			
Iron	mg/L															4.6	3	3.1
Magnesium	mg/L												36	39	39	62	43	45
Manganese	mg/L															0.59	0.54	0.57
Nitrate as N	mg/L												0.05 R	0.05 R		0.1 U	0.1 U	0.1 U
Nitrite as N	mg/L												0.05 R	0.05 R				
Nitrogen Nitrate-Nitrite	mg/L														0.05 U			
Phosphorus (as phosphate)	mg/L												0.031 U	0.031 U	0.31 U	0.14 J	0.31 U	0 31 U
Potassium	mg/L												4.5 J	5	4.7 J	7.2	5.1	5.3
Sodium	mg/L												140	150	170	280	130	130
Sample Parameters																		
Dissolved Oxygen	mg/L	0.22	0.91	0.56	0.22	0.46	0 3	0.43	0 64	0 23	0.08	0.04		0.29	2.06	0 23		0.16
Oxidation Reduction Potential	mV	-129.7	-21.6	-94.6	-132.6	-81 7	-79 6	-21.3	-36.5	-42.6	-64	-102.4		-91.2	-256.1	46 3		-189 2
Eh	mV	70 3	178.4	105.4	67.4	118.3	120.4	178.7	163.5	157.4	136.0	97.6		108.8	-56.1	246.3		10.8
pH	SU	7.81	7.49	7.04	7.52	7.48	7.11	7.26	7.37	7.42	7.45	7.36		7.8	6.74	7.43		7.57
Spec f c Conductance	uS/cm	834	1049	1060	1237	940	1096	1099	1110	1294	1255	1612		2757	1889	1798		1384
Temperature	deg C	12.71	15.9	16.1	13.9	13.6	13	13.8	14.2	14.5	13.3	13		14.13	13 6	8.1		13.8
Turb dity	NTU	4.72	1.56	1.48	3.8	2.23	3.65	3.16	1 78	0.4	4.59	4.88		3.59	1.35	3.56		1.49

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW16															
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-15	2018-04-24	2018-10-29		2019-05-03	2019-11-08	
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	FD	N	N	FD	N
Chemical Name	Un t																
CCR Appendix I I I																	
Boron	mg/L	1.1	1.8	1.6	1.2	0.89	1.3	1	1.4	1.1		1.4	1.4	1.4	1.6		1.9
Ca cium	mg/L	230	180	170	120	160	210	220	240	57		220	160	160	210		210
Ch oride	mg/L	53	37	30	28	24	25	28	31	42		58	36	36	28		59
Fluoride	mg/L	1.4 J	1 6 J	1.3 J	1.5	1.3 J	1.3 J	1.2 J	1.3 J	1.5 J	1 J	1.2 J	1.1	1.1	0.99		1.1
pH	SU	7.92	7.18	7.48	7.5	7.58	7.17	7.36	7 06	7 62	7.41	7.67		7.28	7.46		7.8
Su fate	mg/L	530 J-	400	320	47	300	500	480	630	520		530	340	350	570		530
Total Dissolved Solids	mg/L	1100	810	790	570	670	930	1000	1100	980		1100	740	730	1100		1100
CCR Appendix IV																	
Ant mony	mg/L	0.002 U	0.002 U	0.00028 J	0.002 U	0.002 U	0 002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0 002 U		0 002 U
Arsenic	mg/L	0.011	0.0077	0.012	0.0084	0.0079	0.006	0.008	0.0096		0.002 J	0.0065	0.01	0.0098	0.005		0.0082
Barium	mg/L	0.049	0.042	0.035	0.024	0 029	0.043	0.044	0.054		0.057	0.045	0.035	0.035	0.034		0 034
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0 001 U		0 001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0 001 U		0 001 U
Chromium	mg/L	0 00062 J	0.002 U	0.002 U	0.0031	0.002 U	0 002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0 002 U		0 002 U
Cobalt	mg/L	0.001 U	0.00068 J	0.00051 J	0.00046 J	0.00055 J	0.00092 J	0.00094 J	0.0011		0 0013		0.00059 J	0 00061 J	0.00066 J		0.00061 J
Fluoride	mg/L	1.4 J	1 6 J	1.3 J	1.5	1.3 J	1.3 J	1.2 J	1.3 J	1.5 J	1 J	1.2 J	1.1	1.1	0.99		1.1
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0 001 U		0 001 U
L thium	mg/L	0 00043 J	0.008 U	0.008 U	0.00023 J	0.008 U	0 008 U	0 008 U	0.008 U		0.008 U		0.008 U	0.008 U	0 008 U		0 008 U
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U		0.0002 U	0.0002 U	0.0002 U		0.0002 U
Molybdenum	mg/L	0.024	0.036	0.045	0.044	0.03	0.027	0.023	0.024		0.027	0.031	0.033	0.033	0.027		0 028
Radium Total	pci/L	1 68	0.543	0.527 U	0.629 U	0 648	0.392 U	0 339 U	0.429		0.862 J	0.29	0.862 J	1.32 J	0.685 U		
Radium-226	pci/L	0.537 J	0.249	0.363 U	0.256 U	0.129 U	0.094	0.106 J	0.246		0.1	0.0822	0.214 J	0.278 J	0 277 U		
Radium-228	pci/L	1 14	0.395 U	0.527 U	0.629 U	0 528	0.392 U	0 339 U	0.322 U		0.762 J	0.208	0.648 J	1.04 J	0 685 U		
Selenium	mg/L	0.005 U	0.005 U	0.0005 J	0.0005 J	0.005 U	0.0012 J	0 005 U	0.005 U		0.0015 J		0.005 U	0.005 U	0 005 U		0 0015 J
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0 001 U		0 001 U
Supplemental Parameters																	
Alkal nity Bicarbonate (HCO3)	mg/L																
Alkal nity Carbonate (CO3)	mg/L																
Alkal nity Hydrox de (OH)	mg/L																
Alkal nity Total	mg/L													180	200	5 U	210
Ferr c Iron	mg/L													1,8			
Ferrous Iron	mg/L													0.19 J			
Iron	mg/L														1.4	1.6	1 7
Magnesium	mg/L													23	29	29	31
Manganese	mg/L														0.35	0.29	0.31
Nitrate as N	mg/L														0.042 J	0.1 U	0 1 U
Nitrite as N	mg/L																
Nitrogen Nitrate-Nitrite	mg/L													0.056			
Phosphorus (as phosphate)	mg/L													1.2	0.55	0.47	0.42
Potassium	mg/L													4.3 J	4.2 J	4.9 J	5 2
Sodium	mg/L													41	41	36	38
Sample Parameters																	
Dissolved Oxygen	mg/L	0.16	0.27	0.48	0.31	0.36	0.14	0.5	0 14	0 06	0.22	0.22		1.27	0.29		4.02
Oxidation Reduction Potential	mV	-18.06	711.6	-124 8	-78.8	-136.9	-73 6	-114.2	9.6	-158.4	-55.9	-106.5		-216.8	8		-2
Eh	mV	181.9	911.6	75.2	121.2	63.1	126.4	85.8	209.6	41.6	144.1	93.5		-16.8	208.0		198.0
pH	SU	7.92	7.18	7.48	7.5	7.58	7.17	7.36	7.06	7 62	7.41	7.67		7.28	7.46		7.8
Spec f c Conductance	uS/cm	1331	1112	927	751	821	1257	1123	1406	1254	1029	1239		1046	1001		1014
Temperature	deg C	15.02	18.8	18.15	12.1	9.72	10.6	15.41	18	17.8	8.71	9.2		17.81	10 5		17.52
Turb dity	NTU	3.89	2.16	1.93	3.16	4.14	3.25	4.33	2.45	4.95	4.62	12.81		3.64	4.65		3.98

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW16B																
Sample Date		2016-07-13	2016-09-08	2016-11-09		2017-01-11	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-15	2018-04-24	2018-09-07	2018-10-29	2019-05-06	2019-11-08	
Samp e Type		N	N	FD	N	N	N	N	N	N	N	N	N	N	N	N	FD	N
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	1.8	1.6	1.4	1.4	1.4	1.4	1.1	3.4	6.5	2.9		4.1	7.6	9.7	12	11	10
Ca cium	mg/L	230	190	180	180	210	210	270	220	260	100		250	310	350	350	300	280
Ch oride	mg/L	63	56	57	55	57	47	71	71	120	78		140	160	150	190	220	210
Fluoride	mg/L	1.1 J	1 1 J	0.84 J	0.73 J	0.99 J	0.87 J	0.83 J	0.76 J	0.78 J	1 J	0.8 J	0.76 J	0 73 J	0.64	0.76	1	1
pH	SU	7.76	7.47		7.41	7.57	7.55	7.3	7.51	7.28	7.54	7.6	7.65	7.97	7.02	7.49		7.85
Su fate	mg/L	580 J-	480	500	440	50	470	730	720	640	580		690	760	890	940	1500	1500
Total Dissolved Solids	mg/L	1100	1000	1000	1000	1000	1000	1300	1200	1400	1200		1400	20 U	1600	1800	2400	2400
CCR Appendix IV																		
Ant mony	mg/L	0.002 U	0.002 U	0.00057 J	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U		0.00095 J		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0 0068	0.0064	0.011	0.011	0.012	0.0095	0.012	0 0096	0.0081		0.0099	0.0097	0.011	0.0088	0.0071	0.0079	0.0076
Barium	mg/L	0.072	0 04	0.036	0.035	0.038	0.039	0.055	0.043	0.046		0.053	0.058	0.068	0.071	0.079	0.055	0.054
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.00022 J		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.00029 J	0.002 U	0.00026 J	0 002 U	0.002 U	0.002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.00016 J	0.00019 J	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.0003 J		0.00054 J	0.001 U	0.001 U	0.001 U	0.001 U
Fluoride	mg/L	1.1 J	1 1 J	0.84 J	0.73 J	0.99 J	0.87 J	0.83 J	0.76 J	0.78 J	1 J	0.8 J	0.76 J	0 73 J	0.64	0.76	1	1
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0055 J	0.008 U	0.0032 J	0.0022 J	0 0058 J	0.0035 J	0.0072 J	0 006 J	0.0061 J		0.007 J		0 0059 J	0.0059 J	0.007 J	0.0054 J	0.0055 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 UJ		0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.013	0.012	0.012	0.012	0.012	0.013	0.023	0.016	0.013		0 016	0.015	0.012	0.011	0.014	0 02	0.019
Radium Total	pci/L	1 31	1 05	0.866	0.794	0.998 J	0.577	1 23	0.795	1.21		1.11 J	0.99	1.17 J	1.64 J	0.984		
Radium-226	pci/L	0.651 J	0.458	0.427	0.412 U	0.507	0.348	0.635	0.54 J	0.559		0.443	0.535	0.724 J	0.719 J	0.753		
Radium-228	pci/L	0 66	0 59	0.467 U	0.435 U	0.491 J	0 399 U	0.597	0.287 U	0.647		0.671 J	0.455	0 522 U	0.919 J	0.459 U		
Selenium	mg/L	0.005 U	0.005 U	0.00061 J	0.005 U	0.005 U	0 005 U	0.005 U	0.005 U	0.005 U		0.005 U		0.005 U	0.005 U	0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L													200				
Alkal nity Carbonate (CO3)	mg/L													5 U				
Alkal nity Hydrox de (OH)	mg/L													5 U				
Alkal nity Total	mg/L													200	210	190		200
Ferr c Iron	mg/L													6 J	5.1			
Ferrous Iron	mg/L													0.1 R	1.8 J			
Iron	mg/L															9.2		7.5
Magnesium	mg/L													46	53	58		49
Manganese	mg/L															0.49		0.39
Nitrate as N	mg/L													0.05 R		0.018 J		0.1 U
Nitrite as N	mg/L													0.05 R				
Nitrogen Nitrate-Nitrite	mg/L														0.063			
Phosphorus (as phosphate)	mg/L													0.19	0 28 J	0.22 J		0.17 J
Potassium	mg/L													4.9 J	5.2	5.5		6.3
Sodium	mg/L													84	84	97		380
Sample Parameters																		
Dissolved Oxygen	mg/L	1.23	1.63		0.39	0.3	0.21	0.12	0.32	0.16	0.15	0.28	0.25	1.02	4.23	0 33		3.41
Oxidation Reduction Potential	mV	-122.6	-89		-126.3	-148.5	-132.2	-130.2	-123.1	-32.7	-135.8	-75.5	-117.8	-101.5	-166.8	21.2		-99.5
Eh	mV	77.4	111.0	200.0	73.7	51.5	67.8	69 8	76.9	167.3	64.2	124.5	82.2	98.5	33.2	221.2		100.5
pH	SU	7.76	7.47		7.41	7.57	7.55	7.3	7.51	7.28	7.54	7.6	7.65	7.97	7.02	7.49		7.85
Spec f c Conductance	uS/cm	1147	1297		1158	1230	1192	1645	1333	1665	1461	1142	1653	3104	2098	1692		2340
Temperature	deg C	13.04	14.44		15 27	14.3	13.37	12 3	13.48	14.3	15	12.6	12.3	15	17.7	11.2		14.65
Turb dity	NTU	4.1	3.99		1 8	2.76	4.21	4.58	3.27	2.48	3.9	4.08	4 2	4.99	3.49	3.72		2.81

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW17																
Sample Date		2016-07-14	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-24	2017-10-04	2018-03-14		2018-04-23		2018-10-29	2019-05-09	2019-11-08	
Samp e Type		N	N	N	N	N	N	N	N	N	FD	N	FD	N	N	N	N	
Chemical Name	Un t																	
CCR Appendix I I I																		
Boron	mg/L	12	12	11	11	11	8.9	7.6	12	12			5.8	5.8	16	7.7	4.9	
Ca cium	mg/L	150	160	170	180	200	180	120	150	64			110	110	200	130	120	
Ch oride	mg/L	110	100	130	150	140	81	170	130	160			40	38	150	90	92	
Fluoride	mg/L	1.8 J	2 2 J	2 J	1.9 J	1.6 J	1.6 J	0.79 J	1.9 J	2.4 J	5 U	1.7 J	1.9 J	1.9 J-	1.7	1.6	1.7	
pH	SU	7.56	7.27	7.21	7.33	7.54	7.23	7.4	7 16	7 22		7.62		7 82	6.85	7.53	7.75	
Su fate	mg/L	330 J-	330	360	390	390	390	520	250	350			240	220	430	300	290	
Total Dissolved Solids	mg/L	940	920	940	1000	1100	950	1400	890	1000			630	620	1100	800	860	
CCR Appendix IV																		
Ant mony	mg/L	0 00034 J	0.00032 J	0.00032 J	0.002 U	0.00028 J	0 002 U	0 002 U	0.002 U		0.002 U	0.002 U			0.002 U	0.002 U	0 002 U	
Arsenic	mg/L	0 0054	0.0056	0.0042 J	0.0069	0.0055	0.0054	0 0035 J	0.0028 J		0.005 U	0.0027 J			0.004 J	0 0021 J	0.0028 J	
Barium	mg/L	0.047	0.056	0.054	0.05	0 054	0.048	0.044	0.06		0.041	0.058		0.029	0.073	0.041	0.052	
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.00076 J	0 001 U	
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0 001 U	
Chromium	mg/L	0.0015 J	0.002 U	0.0011 J	0.0011 J	0.0012 J	0.0012 J	0 002 U	0.002 U		0.0017 J	0.0014 J			0.002 U	0.002 U	0 002 U	
Cobalt	mg/L	6 3E-05 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0 001 U	
Fluoride	mg/L	1.8 J	2 2 J	2 J	1.9 J	1.6 J	1.6 J	0.79 J	1.9 J	2.4 J	5 U	1.7 J	1.9 J	1.9 J-	1.7	1.6	1.7	
Lead	mg/L	0 00018 J	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.001 U	0 001 U	
L thium	mg/L	0.0047 J	0.008 U	0.0036 J	0.0047 J	0.0024 J	0.0045 J	0 0058 J	0.0076 J		0.008 U	0.0035 J			0.0066 J	0 0035 J	0.0052 J	
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0.0002 U	0.0002 U			0.0002 U	0.0002 U	0.0002 U	
Molybdenum	mg/L	0.015	0.012	0.011	0.01 U	0.01	0.011	0.018	0.024		0.024	0.024		0.02	0.017	0.017	0.012	
Radium Total	pci/L	0.569	0.451 U	0.447 U	0.553 U	0.428	0.477	0.403 U	0.71		0.816 J	0.384 U		0.205	1.1 J	0.518 U		
Radium-226	pci/L	1 U	0.331	0.415 U	0.246 U	0 222	0.23	0 191 J	0.215		0.202	0.112		0.0399	0.315 J	0.26 U		
Radium-228	pci/L	1 U	0.451 U	0.447 U	0.553 U	0.402 U	0.406 U	0.403 U	0.495		0.614 J	0.384 U		0.166	0.783 J	0.518 U		
Selenium	mg/L	0.019	0 03	0.018	0.023	0 028	0.026	0.0081	0.0032 J		0.0074	0.021		0.015	0.022	0.004 J	0.011	
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U	0.001 U			0.001 U	0.00063 J	0 001 U	
Supplemental Parameters																		
Alkal nity Bicarbonate (HCO3)	mg/L																	
Alkal nity Carbonate (CO3)	mg/L																	
Alkal nity Hydrox de (OH)	mg/L																	
Alkal nity Total	mg/L														190	160	160	
Ferr c Iron	mg/L														0.1 U			
Ferrous Iron	mg/L														0.05 UJ			
Iron	mg/L															0.2 U	0 2 U	
Magnesium	mg/L														67	49	40	
Manganese	mg/L															0.015 U	0 015 U	
Nitrate as N	mg/L															0.97	2	
Nitrite as N	mg/L																	
Nitrogen Nitrate-Nitrite	mg/L														2.8			
Phosphorus (as phosphate)	mg/L														0.47	0 28 J	0.3 J	
Potassium	mg/L														5.3	3.5 J	5	
Sodium	mg/L														34	31	28	
Sample Parameters																		
Dissolved Oxygen	mg/L	5.78	1.7	1.8	1.01	2.35	7.33	3.18	4 33	3.3		4.99		9	1.78	5.75	6.47	
Oxidation Reduction Potential	mV	45 8	825.9	6.1	82.3	6.6	67.9	23.3	8	57.9		-90.2		-90.2	-237	53.1	35	
Eh	mV	245.8	1025.9	206.1	282.3	206.6	267.9	223.3	208.0	257.9	200.0	109.8		109.8	-37.0	253.1	235.0	
pH	SU	7.56	7.27	7.21	7.33	7.54	7.23	7.4	7.16	7.22		7.62		7 82	6.85	7.53	7.75	
Spec f c Conductance	uS/cm	1059	1287	1141	1272	1541	1290	902	1151	1357		832		675	1513	894	798	
Temperature	deg C	17.23	20.6	18.63	13.6	10.95	11.8	17.71	24.4	22.3		10.9		11.4	20	12.1	17.23	
Turb dity	NTU	1.56	1.09	0.58	2.58	0.44	2.21	1.02	1.5	2 51		0.54		1.19	0.45	0.44	0.86	

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW17B														
Sample Date		2016-07-13	2016-09-08	2016-11-09	2017-01-10	2017-03-02	2017-04-27	2017-06-29	2017-08-23	2017-10-04	2018-03-14	2018-04-23	2018-09-06	2018-10-29	2019-05-09	2019-11-08
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Chemical Name	Un t															
CCR Appendix I I I																
Boron	mg/L	18	19	19	21	22	20	16	13	11		13	10	12	12	9.4
Ca cium	mg/L	230	250	240	250	270	250	240	160	57		180	150	150	180	150
Ch oride	mg/L	180	170	180	190	200	200	71	99	130		140	120	110	130	110
Fluoride	mg/L	0.9 J	0.98 J	0.68 J	0.58 J	0.6 J	0.6 J	2.1 J	1.3 J	1.1 J	0.55 J	0.58 J	0.84 J	0.71	0.62	0.67
pH	SU	7.43	7.37	7.1	7.24	7.44	7.02	7.25	7 19	7 38	7.48	7.39	7.63	7.4	7.15	7.66
Su fate	mg/L	710 J-	680	710	740	710	680	300	380	420		520	350	350	270	350
Total Dissolved Solids	mg/L	1500	1400	1400	1500	1700	1500	660	1000	960		1100	940	950	980	990
CCR Appendix IV																
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0 002 U
Arsenic	mg/L	0.0024 J	0.0021 J	0.0024 J	0.0035 J	0.0023 J	0.0022 J	0 0023 J	0.0026 J		0.0011 J		0.0017 J	0.0023 J	0.0022 J	0.0019 J
Barium	mg/L	0.078	0.079	0.086	0.092	0 1	0.089	0.065	0.06		0.085	0.069	0.066	0.073	0.11	0.074
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.00033 J	0 001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0 001 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U		0.002 U		0.002 U	0.002 U	0.002 U	0 002 U
Cobalt	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.0003 J	0.001 U	0.001 U	0 001 U
Fluoride	mg/L	0.9 J	0.98 J	0.68 J	0.58 J	0.6 J	0.6 J	2.1 J	1.3 J	1.1 J	0.55 J	0.58 J	0.84 J	0.71	0.62	0.67
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.001 U	0 001 U
L thium	mg/L	0.0017 J	0.008 U	0.008 U	0.0019 J	0.00046 J	0.0021 J	0 0019 J	0.008 U		0.008 U		0.008 U	0.008 U	0.008 U	0 008 U
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ		0 0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.024	0.021	0.013	0.011	0 012	0.011	0.017	0.021		0.017	0.016	0.01	0.011	0.0073 J	0.01
Radium Total	pci/L	1 79	1 84	2.53	2.58	1.25	1.94	1.03	2.4			1.21	1.47	2.48 J	1.71	
Radium-226	pci/L	0.882 J	0.864	1.28	1.4	1.01	1.09	0 639 J	0.867			0.518	0.945	1.15 J	0.964	
Radium-228	pci/L	0.913	0.98	1.25	1.17	0.423 U	0.846	0.395	1.53			0.696	0.524	1.33 J	0.748	
Selenium	mg/L	0.005 U	0.005 U	0.005 U	0.00053 J	0.00051 J	0 005 U	0 005 U	0.005 U		0.005 U		0.0011 J	0.005 U	0.005 U	0 005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U		0.001 U		0.001 U	0.001 U	0.00022 J	0 001 U
Supplemental Parameters																
Alkal nity Bicarbonate (HCO3)	mg/L												210			
Alkal nity Carbonate (CO3)	mg/L												5 U			
Alkal nity Hydrox de (OH)	mg/L												5 U			
Alkal nity Total	mg/L												210	230	300	190
Ferr c Iron	mg/L												4.1 J	3		
Ferrous Iron	mg/L												0.1 R	1.5 J		
Iron	mg/L														6.8	5.1
Magnesium	mg/L												32	33	53	44
Manganese	mg/L														1	0.76
Nitrate as N	mg/L												0.05 R		0.1 U	0.1 U
Nitrite as N	mg/L												0.05 R			
Nitrogen Nitrate-Nitrite	mg/L													0.23		
Phosphorus (as phosphate)	mg/L												0.46	0.17 J	0.31 U	0.31 U
Potassium	mg/L												5.7	6 2	9.5	6.1
Sodium	mg/L												83	110	39	42
Sample Parameters																
Dissolved Oxygen	mg/L	0.33	0.24	0.67	0.36	0.13	0.13	0.18	0 14	0 09	0.16	0.11	0.2	0.88	0.23	4.2
Oxidation Reduction Potential	mV	-115	654	-100 8	-119.6	-91 8	102 3	-98.6	-51.1	-129.4	-95.2	-131.9	-91.9	-244.5	11.8	-3.6
Eh	mV	85 0	854.0	99.2	80.4	108.2	302 3	101.4	148.9	70.6	104.8	68.1	108.1	-44.5	211 8	196.4
pH	SU	7.43	7.37	7.1	7.24	7.44	7.02	7.25	7 19	7 38	7.48	7.39	7.63	7.4	7.15	7.66
Spec f c Conductance	uS/cm	1525	1734	1568	171.9	2251	1950	1488	1244	1337	1235	1463	2077	1380	1060	890
Temperature	deg C	15.29	16.16	15.77	15	14.8	14.4	15.62	16.5	16.6	15.2	15.2	16.55	16.1	13.6	15.05
Turb dity	NTU	4.09	2.48	0.62	0.92	0.58	2.11	2.35	1 86	3.45	3.76	3.88	3.55	4.86	3.61	2.68

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW18																	GAMW18B				
Sample Date		2016-07-13	2016-09-08	2016-11-09		2017-01-10	2017-03-01	2017-04-26	2017-07-12		2017-08-23	2017-10-03		2018-03-14	2018-04-23	2018-10-25	2019-04-29	2019-11-07	2018-09-10	2018-10-25		2019-04-29	2019-11-07
Samp e Type		N	N	FD	N	N	N	N	FD	N	N	FD	N	N	N	N	N	N	N	FD	N	N	N
Chemical Name	Un t																						
CCR Appendix I I I																							
Boron	mg/L	1.8	3.5	1.9	1.8	1.3	1	0.77	1.2	1.2	1.5	1.9	1.9		1.2	1.7	0.95	1.7	13	12	13	14	11
Ca cium	mg/L	320	610	370	360	330	280	210	280	290	300	380 J	64 J		320	230	320	360	260	200	220	240	180
Ch oride	mg/L	17	39	17	17	9.3	5	4.3	10	10	11	23	23		7.3	22	12	27	150	140	140	170	140
Fluoride	mg/L	0.047 J	0 036 J	10 U	10 U	5 U	5 U	2 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	0 057	0.074	0.15	0.77 J	0.74	0 73	0.88	0.99
pH	SU	6.95	6.83		6.7	6.88	7 11	6.6		6.96	7.02		6.91	7.2	7.21	6.54	6.71	7.18	7.73		6.86	7.15	7.68
Su fate	mg/L	760 J-	1400	850	830	640	540	370	600	610	690	960	950		670	550	780	920	1100	1000	1100	1100	840
Total Dissolved Solids	mg/L	1300	2200	1500	1500	1200	1000	730	1100	1100	1300	1600	1500		2400	1100	1400	1500	2100	2000	2000	2100	1500
CCR Appendix IV																							
Ant mony	mg/L	0.002 U	0.002 U	0.00096 J	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0014 J	0.0023 J	0.0014 J	0.00091 J	0 0014 J	0.005 U	0.0015 J	0.0021 J	0.0021 J	0.0011 J			0.005 U		0.005 U	0.00079 J	0.005 U	0.0018 J	0.0026 J	0.0028 J	0.0037 J	0.0041 J
Barium	mg/L	0.038	0.047	0.041	0.039	0.037	0.024	0.021	0.051	0.052	0.055			0.048	0.035	0.037	0.039	0.05	0.048	0.035	0.039	0.039	0.024
Beryllium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.00094 U	0.001 U	0 001 U	0.001 U	0.001 U	0.00053 U	0.001 U
Cadmium	mg/L	8 1E-05 J	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.00067 J	0.00046 J	0 0005 J	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U			0.002 U		0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.00023 J	0.00047 J	0.0002 J	0.00024 J	0.001 U	0.00023 J	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.00028 J	0 001 U	0.00027 J	0.00026 J	0.00028 J	0 00024 J	0 00024 J
Fluoride	mg/L	0.047 J	0 036 J	10 U	10 U	5 U	5 U	2 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	0 057	0.074	0.15	0.77 J	0.74	0 73	0.88	0.99
Lead	mg/L	0.001 U	0.001 U	0.00051 J	0.00025 J	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.00067 J		0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U
L thium	mg/L	0 00096 J	0.008 U	0.008 U	0.008 U	0.00042 J	0.008 U	0.008 U	0.008 U	0.008 U	0.008 U			0.008 U		0.008 U	0.008 U	0.008 U	0.025	0.015	0.016	0.023	0.015
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 UJ			0 0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U
Molybdenum	mg/L	0 11	0.18	0.14	0.13	0.094	0.1	0.1	0.1	0.11	0.1			0.097	0.085	0 057	0.062	0.076	0.024	0.014	0.015	0.026	0.011
Radium Total	pci/L	5 U	0.803	0.474	0.449	0 581 U	0.398 U	0.384 U	0.493	0.337 U	0 629			0.373 U	0 259	0.477	0.365 U		1.7	1.28	1.46		
Radium-226	pci/L	1 U	0.348	0.334 U	0.33 U	0.325	0.13	0.131 U	0.166 J	0.179 J	0.332			0.111	0.0715	0 291	0.325 U		0.773 J	0.717	0.748	0.41	
Radium-228	pci/L	1 U	0.49 U	0.455 U	0.413 U	0 581 U	0.398 U	0.384 U	0.381 U	0.337 U	0.369 U			0.373 U	0.187	0.357 U	0.365 U		0.928	0.562	0.708	0.941	
Selenium	mg/L	0 01	0.018	0.0065	0.0052	0.0099	0.011	0.0053	0.012	0.012	0 006			0.009	0.0084	0 015	0.015	0.012	0 005 U	0.005 U	0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U			0.001 U		0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U
Supplemental Parameters																							
Alkal nity Bicarbonate (HCO3)	mg/L																		230				
Alkal nity Carbonate (CO3)	mg/L																		5 U				
Alkal nity Hydrox de (OH)	mg/L																		5 U				
Alkal nity Total	mg/L															240	190	250	230		230	210	200
Ferr c Iron	mg/L															0.032 J			6.8 J		2.9		
Ferrous Iron	mg/L															0.05 UJ			0.1 R		1.3 J		
Iron	mg/L																0.16 J	0.083 J				3.6	3
Magnesium	mg/L															16	17	23	66		58	67	51
Manganese	mg/L																0.0047 J	0.014 J				0.69	0 66
Nitrate as N	mg/L																0.19	0.51	0 05 UJ			0.1 U	0.1 U
Nitrite as N	mg/L																		0 05 UJ				
Nitrogen Nitrate-Nitrite	mg/L															0.55					0.05 U		
Phosphorus (as phosphate)	mg/L															0.31 U	0.14 J	0.31 UJ	0 031 U		0.31 U	0.31 U	0.31 UJ
Potassium	mg/L															3.4 J	2 J	3.7 J	7.3		5.7	7.8	4.4 J
Sodium	mg/L															28	24	39	260		240	260	180
Sample Parameters																							
Dissolved Oxygen	mg/L	4.83	4.77		5.93	7.52	8 86	7.79		6.04	4.52		5 32	6.5	8.49	3.78	7.01	2.95	0.24		0.29	0.92	0.36
Oxidation Reduction Potential	mV	98.9	76.8		28.7	106.8	97.9	209.2		203.2	24.7		121.9	-129 6	-51.6	-36.6	129.2	-41.1	-140.7		-103.4	109.2	-144.8
Eh	mV	298.9	276.8		228.7	306.8	297.9	409.2	200.0	403.2	224.7		321.9	70.4	148.4	163.4	329.2	158.9	59.3		96.6	309.2	55.2
pH	SU	6.95	6.83		6.7	6.88	7 11	6.6		6.96	7.02		6.91	7.2	7.21	6.54	6.71	7.18	7.73		6.86	7.15	7.68
Spec f c Conductance	uS/cm	1474	2362		1740	1255	986	970		1299	1414		1760	905	1170	1230	1060	1338	3311		2147	1902	1475
Temperature	deg C	16 3	20.1		16 6	9.65	8.47	11.2		17.9	19.8		19.3	8.1	8.9	17.4	8 8	14.2	15.39		14.9	11.8	13.7
Turb dity	NTU	3.32	1.63		2.38	3.05	4.44	2.48		1.71	1.03		4 16	4.59	0.71	1.29	4.55	2.04	2.78		3.58	3 21	3.14

Notes:
CCR = coal combustion res dual
mg/L = m ligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW46								GAMW46B								GAMW52					
Sample Date		2018-06-13	2019-03-01	2019-04-17	2019-06-06	2019-07-18	2019-08-26	2019-10-04	2019-11-19	2018-06-13	2019-03-04	2019-04-17	2019-06-07	2019-07-18	2019-08-26	2019-10-04	2019-11-19	2018-09-10	2018-10-31		2019-05-09	2019-11-14	
Samp e Type		N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	FD	N	N	FD	N
Chemical Name	Un t																						
CCR Appendix I I I																							
Boron	mg/L	0.055 J	0.1 U	0.033 J	0.1 U	0.032 J	0.053 J	0.043 J	0.049 J	0.05 J	0.05 J	0.037 J	0.047 J	0.03 J	0.05 J	0.047 J	0.046 J	0.34		0.17	0.077 J		0.13
Ca cium	mg/L	56	14	28	25 J-	25	25	23	27	25	58	58	56	52	58	49	56	75		59	52		72
Ch oride	mg/L	8.4	2.4	1.9		1 8	1.6	1.6	1.6	3	7.9	7.9		7 2	8	7.1	6.9	34		9.1	5.5		37
Fluoride	mg/L	0.052 J	0.068	0.063		0 065	0.06	0 079 J	0.062	0 048 J	0.066	0.076		0.072	0.069	0.073 J	0.072	0.36 J		0.3	0.25 J		0.3
pH	SU	7.93	8.17	8.23	7.52	8.15	7.9	7.81	7.77	8.2	7.11	7.99	7.58	8.18	7.62	7.44	7.47	7.5		7.06	7.17		7.59
Su fate	mg/L	55	34	30		28	29	30	27	29	64	64		64	68	65	64	86		39	24		67
Total Dissolved Solids	mg/L	260	160	150		130	150	140 J	140	150	260	290		240	220 J	250	240	400		250	240		350
CCR Appendix IV																							
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U		0 002 U	0.002 U		0.002 U
Arsenic	mg/L	0.0014 J	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.00086 J	0.005 U	0.0015 J	0.0012 J	0.00076 J	0.005 U	0.00091 J	0.00095 J	0.0013 J	0.001 J	0.005 U		0 005 U	0.005 U		0 005 U
Barium	mg/L	0.027	0.0028 J	0.0059	0.0065	0.0054	0.0054	0 0049 J	0.0059	0.0086	0.027	0.026	0.025	0.023	0.024	0.021	0.025	0.039		0.019	0.015		0.02
Beryllium	mg/L	0.001 U	0.005 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00054 J	0.001 U	0.001 U	0 0011	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.0011	0.001 U		0 001 U	0.001 U		0.001 U
Cadmium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0.00024 J	0.001 U		0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.0014 J	0 002 U	0.002 U	0.0021	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0 002 U	0.002 U		0 002 U	0.002 U		0.002 U
Cobalt	mg/L	0.0002 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0 00034 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.00058 J		0.00031 J	0.001 U		0.001 U
Fluoride	mg/L	0.052 J	0.068	0.063		0 065	0.06	0 079 J	0.062	0 048 J	0.066	0.076		0.072	0.069	0.073 J	0.072	0.36 J		0.3	0.25 J		0.3
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U		0 001 U	0.001 U		0.001 U
L thium	mg/L	0.008 U	0 04 U	0.008 U	0.008 U	0.008 U	0 008 U	0 008 U	0.008 U	0.008 U	0.0017 J	0.008 U	0.008 U	0.002 J	0.008 U	0 008 U	0 003 J	0.0017 J		0 008 U	0.008 U		0.0025 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U		0.0002 U
Molybdenum	mg/L	0.0031 J	0 01	0.01 U	0.01 U	0.01 U	0 01 U	0 0015 J	0.01 U	0.0018 J	0.0024 J	0.0022 J	0.0025 J	0.0028 J	0.0028 J	0.0025 J	0.003 J	0.005 J		0.0035 J	0.0016 J		0.0017 J
Radium Total	pci/L	0.384 U	0.486 U	0.33 U		0.427 U	0.505 U	0.566		0.392 U	0.402 U	0.308 U		0.427 U	0.609 U	0.408 U		0.796		1 J	0.53 U		
Radium-226	pci/L	0.244 U	0.103 U	0.0708 U		0.214 U	0.0925 UJ	0 179 J		0.223 U	0.286	0.108		0.232 U	0.105 UJ	0.192 J		0.46 J		0 299 J	0.436		
Radium-228	pci/L	0.384 U	0.486 U	0.33 U		0.427 U	0.505 UJ	0.481 U		0.392 U	0.402 U	0.308 U		0.427 U	0.609 UJ	0.408 U		0.392 U		0 706 J	0.53 U		
Selenium	mg/L	0.001 J	0.025 U	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U	0.0017 J	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0 005 U	0.0014 J		0.0017 J	0.0014 J		0.0011 J
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00059 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.00068 J	0.001 U		0 001 U	0.001 U		0.001 U
Supplemental Parameters																							
Alkal nity Bicarbonate (HCO3)	mg/L																	210					
Alkal nity Carbonate (CO3)	mg/L																	5 U					
Alkal nity Hydrox de (OH)	mg/L																	5 U					
Alkal nity Total	mg/L			82					73			140					130	210	180	190	170	190	190
Ferr c Iron	mg/L																	0.2 J	0.1 U	0.1 U			
Ferrous Iron	mg/L																	0.1 R	0 05 J	0.05 UJ			
Iron	mg/L			0.054 J					0 2 U			1.5					1.6				0.2 U	0.2 U	0.2 U
Magnesium	mg/L			9.7					7.8			15					14	20	16	15	16	20	21
Manganese	mg/L			0.0066 J					0.015 U			0.26					0.23				0.0022 J	0.017	0.02
Nitrate as N	mg/L			0.58					0.48			0.1 U					0.1 U	1 J			1.9	1.1	1.1
Nitrite as N	mg/L																	0.089 J					
Nitrogen Nitrate-Nitrite	mg/L																		1.3	1.3			
Phosphorus (as phosphate)	mg/L			0.16 J					0.31 U			0.15 J					0.31 U	0.031 U	0.31 U	0.31 U	0.31 U	0.31 U	0.31 U
Potassium	mg/L			0.97 J					1 J			0.83 J					0.82 J	4.7	3 J	2.9 J	2.1 J	3.1 J	3.3 J
Sodium	mg/L			4.6 J					2.4 J			5.4					4.6 J	25	13	13	9 8	18	21
Sample Parameters																							
Dissolved Oxygen	mg/L	0.12	1.85	4.18	6.44	6.58	4.03	2.44	3 36	3 59	0.08	1.9	0.3	1.4	1.25	0.31	0.3	0.48		0.21	6.42		2 2
Oxidation Reduction Potential	mV	-171.4	1.9	7.7	157.6	25.5	40.6	9.16	-141.1	-29.4	111.9	-111.1	-133.1	-93.9	-119.9	33.7	-229.6	-30.3		85.1	108.2		-43 2
Eh	mV	28 6	201.9	207.7	357.6	225.5	240.6	209.2	58.9	170.6	311.9	88.9	66.9	106.1	80.1	233.7	-29.6	169.7		285.1	308.2	200.0	156.8
pH	SU	7.93	8.17	8.23	7.52	8.15	7.9	7.81	7.77	8.2	7.11	7.99	7.58	8.18	7.62	7.44	7.47	7.5		7.06	7.17		7.59
Spec f c Conductance	uS/cm	367	155	161	179	153	153	152	132	211	268	294	282	274	284	260	242	0.896		448	308		320
Temperature	deg C	11.4	8	9.1	11.1	13.2	14.2	14.8	11.7	11.3	9.6	10.8	11	11.9	12.3	12.3	11 3	19.97		17.6	14.2		15.3
Turb dity	NTU	3.96	1.91	1.33	0.51	0.82	0.69	0.89	0 66	3.45	3.26	4.3	3.25	3.11	1.15	4.16	2.84	0.45		0.83	0.42		0.74

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.
UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW52B				GAMW53				GAMW53B					GAMW54				GAMW54B				
Sample Date		2018-09-11	2018-10-31	2019-05-09	2019-11-14	2018-09-11	2018-10-30	2019-04-30	2019-11-14	2018-09-11	2018-10-30		2019-04-30	2019-11-14	2018-09-10	2018-10-31	2019-04-30	2019-11-14	2018-09-10	2018-10-31		2019-05-01	2019-11-15
Samp e Type		N	N	N	N	N	N	N	N	N	FD	N	N	N	N	N	N	N	N	FD	N	N	N
Chemical Name	Un t																						
CCR Appendix I I I																							
Boron	mg/L	0 75	0.8	1	1.3	0.19	0.25	0.056 J	0.13	2.5		3.1	2 2	0.73	0.84	0.77	0.39	0 37	5.6		6.5	5.9	6
Ca cium	mg/L	160	160	110	130	45	53	17	25	180		190	150	140	93	88	93	81	210		220	200	240
Ch oride	mg/L	530	470	380	370	4.9	4.6	1.9	3.6	90		85	81	74	15	10	10	4	100		95	110	120
Fluoride	mg/L	10 U	0.18	0 21 J	0.23	0.17 J	0.17	0.05 U	0.05 U	0.52 J		0.46	0.51	0.7	0 18 J	0.17	0.14	0 28	0.41 J		0.52	0.59	0.58
pH	SU	8.3	7.1	7.42	7.34	6	6.47	5.93	6 21	7.3		7.35	7.41	7.52	6.24	7.92	6 82	7.08	6.95		8.71	7.27	7.2
Su fate	mg/L	210	190	220	290	51	56	37	36	430		510	340	320	190	150	190	76	750		730	710	720
Total Dissolved Solids	mg/L	1500	1300	1100	1100	240	250	130	160	1100		1100	900	770	500	400	470	350	1600		1400	1500	1400
CCR Appendix IV																							
Ant mony	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.00061 J	0.002 U		0.002 U	0.002 U	0.002 U	0 0011 J	0.00074 J	0 00078 J	0.001 J	0.002 U		0.002 U	0.002 U	0.002 U
Arsenic	mg/L	0.0013 J	0.0016 J	0.00083 J	0.0012 J	0.013	0.015	0.00097 J	0.0018 J	0 00079 J		0.00083 J	0.001 J	0.0016 J	0 0024 J	0.0028 J	0.0022 J	0.0045 J	0.0025 J		0.0032 J	0.0045 J	0.005
Barium	mg/L	0 32	0 31	0.25	0.28	0 027	0.028	0.019	0.026	0.052		0.054	0 044	0.072	0.043	0.039	0.031	0.031	0.098		0.093	0.08	0.084
Beryllium	mg/L	0.001 U	0.00042 J	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0.001 U	0.00059 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
Cadmium	mg/L	0.001 U	0.00029 J	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.002 U	0.002 U	0.002 U	0.0019 J	0.0018 J	0 0012 J	0.002 U	0.002 U		0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U		0.002 U	0.002 U	0.002 U
Cobalt	mg/L	0.001 U	0.00032 J	0.001 U	0.001 U	0.00084 J	0.00099 J	0 0005 J	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U	0.00053 J	0.00052 J	0 00062 J	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
Fluoride	mg/L	10 U	0.18	0 21 J	0.23	0.17 J	0.17	0.05 U	0.05 U	0.52 J		0.46	0.51	0.7	0 18 J	0.17	0.14	0 28	0.41 J		0.52	0.59	0.58
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.0014	0.00089 J	0.00057 J	0.00063 J	0.001 U		0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
L thium	mg/L	0.0041 J	0.0031 J	0.0033 J	0.0071 J	0.008 U	0.008 U	0 008 U	0.0021 J	0.0042 J		0.0052 J	0.005 J	0.0066 J	0.008 U	0.008 U	0.008 U	0.0023 J	0.0048 J		0.0036 J	0.0048 J	0.0074 J
Mercury	mg/L	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U		0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U		0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.014	0.015	0.0095 J	0.0086 J	0 012	0.015	0 0051 J	0.011	0.0083 J		0.0075 J	0.0098 J	0.02	0.043	0.044	0.023	0 03	0.018		0.019	0 0085 J	0.012
Radium Total	pci/L	3 52	5.55 J	2.63		0.547 U	1.45 J	0 344 U		1.69		0.48 J	1.26		0.5	1.08 J	0.393 U		2 03		2.7 J	1.82	
Radium-226	pci/L	2 11	2.76 J	1.2		0.257	0.795 J	0 316 U		0.789		0 238 J	0 544		0.385 J	0 237 J	0.337 U		1 18 J		1.35 J	0.956	
Radium-228	pci/L	1.41	2.79 J	1.44		0.547 U	0.658 J	0 344 U		0.897		0.347 U	0.719		0.385 U	0 843 J	0.393 U		0.849		1.35 J	0.865	
Selenium	mg/L	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0 005 U	0.005 U	0.005 U		0.005 U	0.005 U	0.005 U	0 0017 J	0.0012 J	0.0043 J	0.0035 J	0.005 U		0.005 U	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0 001 U	0.001 U	0.001 U		0.001 U	0.00049 J	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U		0.001 U	0.001 U	0.001 U
Supplemental Parameters																							
Alkal nity Bicarbonate (HCO3)	mg/L	220				120				250					150				240				
Alkal nity Carbonate (CO3)	mg/L	5 U				5 U				5 U					5 U				5 U				
Alkal nity Hydrox de (OH)	mg/L	5 U				5 U				5 U					5 U				5 U				
Alkal nity Total	mg/L	220	230	220	200	120	140	53	73	250	240	250	260	190	150	160	160	230	240	230	230	250	260
Ferr c Iron	mg/L	5 J	3.4			2 J	1			3.2 J	2 3	2.7			0 13 J	0.14			5.9 J	4.5	3.4		
Ferrous Iron	mg/L	0.1 R	0.32 J			0 1 R	0.5 J			0.1 R	0 56 J	1 J			0.1 R	0 029 J			0.1 R	0.94 J	1.6 J		
Iron	mg/L			2.7	2.5			0.25	0.28				3 1	2.4			0.14 J	0 31				5.4	5.4
Magnesium	mg/L	37	38	30	28	15	15	8.9	11	23	24	25	23	19	19	18	21	17	38	38	36	42	46
Manganese	mg/L			0.21	0.25			0 0079 J	0.015 U				0.4	0.32			0 0097 J	0.015 U				0.48	0.51
Nitrate as N	mg/L	0.05 UJ		0.1 U	0.1 U	1.3 J		1.4	0.4	0.05 UJ			0.1 U	0.1 U	0.028 J		0.49	0 15	0.05 UJ			0.1 U	0 1 U
Nitrite as N	mg/L	0.05 UJ				0.03 J				0.05 UJ					0 05 UJ				0.05 UJ				
Nitrogen Nitrate-Nitrite	mg/L		0.052				0.05 U				0.099	0.74 J-				0.21				0.15	0.091		
Phosphorus (as phosphate)	mg/L	0.056	0.21 J	0.31 U	0.11 J	0.32	0.31 U	0.31 U	0.31 U	0.031 U	0.14 J	0.52	0.31 U	0.31 U	0.031 U	0.31 U	0.11 J	0.31 U	0.079	0.31 U	0.39	0.38	0.3 J
Potassium	mg/L	6	6.4	7	6.5	2 2	5 U	1.3 J	1.6 J	4.6	5 2	5.4	4.9 J	4.5 J	1.9	1.8 J	1.2 J	1.6 J	6.8	6.8	6.2	6 3	5.6
Sodium	mg/L	220	250	250	210	6 5	7.8	4.9 J	3.9 J	120	130	130	99	75	21	21	15	11	200	200	180	160	140
Sample Parameters																							
Dissolved Oxygen	mg/L	0.44	0.1	0.15	0.19	0.53	0.86	3.11	0 84	0 26		0.8	0.36	0.09	0.61	1.41	0.72	0.26	0.42		2.12	0.42	0.31
Oxidation Reduction Potential	mV	-214.9	-103.5	6.31	-102.9	-24 6	-199.5	43.7	-54.8	-183.2		-168	27.7	-75 3	107 8	-294.7	48.4	-69.5	-123.4		-315.7	-23.1	-43.3
Eh	mV	-14.9	96.5	206.3	97.1	175.4	0.5	243.7	145.2	16.8		32.0	227.7	124 7	307 8	-94.7	248.4	130.5	76.6	200.0	-115.7	176.9	156.7
pH	SU	8.3	7.1	7.42	7.34	6	6.47	5.93	6.21	7.3		7.35	7.41	7.52	6.24	7.92	6 82	7.08	6.95		8.71	7.27	7.2
Spec f c Conductance	uS/cm	1934	2005	1652	1353	307	400	125	155	1354		1620	1160	870	675	630	493	374	1816		1983	1636	1310
Temperature	deg C	17.26	16.6	15.3	16.1	21.3	20.1	11.4	17.5	20.89		20.4	18.7	19.7	21.2	18.53	10.5	15 3	17.6		17.29	15.5	15.8
Turb dity	NTU	1.6	0.88	2.35	1.01	9.93	5.17	4.76	4.8	2.43		3	3.45	2 5	2.03	1	3 24	2.31	4.2		1.64	4.49	1.67

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.

UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Appendix A 1 Groundwater Analytical Data
CCR Unit Schahfer MSRB MCWB and Drying Area
NIPSCO LLC R M Schahfer Generat ng Station
Wheatfield ndiana

Location		GAMW55				GAMW55R	GAMW55B					GAMW56				GAMW56B			
Sample Date		2018-09-10		2018-10-29		2019-11-15	2018-09-11		2018-10-29	2019-05-01	2019-11-15	2018-09-11	2018-10-26	2019-04-29	2019-11-15	2018-09-11	2018-10-29	2019-04-29	2019-11-15
Samp e Type		FD	N	FD	N	N	FD	N	N	N	N	N	N	N	N	N	N	N	N
Chemical Name	Un t																		
CCR Appendix I I I																			
Boron	mg/L	1.9	1.9	1.8	1.8	1.1	7.1	7.4	8 2	9.1	11	0.26	0 28	0 21	0.2	1.2	1 2	2.3	3.2
Ca cium	mg/L	260	250	270	260	180	250	250	260	210	210	130	110	91	120	140	140	150	150
Ch oride	mg/L	58	59	69	70	61	220	220	190	170	150	3.1	2.4	3.2	2.1	50	36	55	64
Fluoride	mg/L	0 51 J	0.52 J	0.47	0.47	0 62	0 29 J	10 U	0.25	0.31	0.31	1.2 J	0.99	0 53	0.71	0.41 J	0.33	0.4	0.44
pH	SU		6.77		7.04	7.46	7.31		7.07	7.19	7.31	6 82	7.17	6.83	7.06	6.95	6.91	7.08	7.21
Su fate	mg/L	590	600	630	620	480	820	820	910	790	750	57	63	54	56	170	130	260	360
Total Dissolved Solids	mg/L	1200	1300	1300	1300	950	1800	1900	1800	1700	1400	470	480	420	440	740	690	830	860
CCR Appendix IV																			
Ant mony	mg/L	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002	0 002 U
Arsenic	mg/L	0.00083 J	0.005 U	0.005 U	0.005 U	0.005 U	0 0014 J	0.0011 J	0.005 U	0.005 U	0.005 U	0.019	0.022	0.011	0.0097	0.005 U	0.005 U	0.005	0 005 U
Barium	mg/L	0 099	0.097	0.068	0.069	0.035	0.14	0.14	0.12	0.074	0.067	0.068	0.049	0.044	0.04	0.076	0 072	0.082	0.076
Beryllium	mg/L	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001	0 001 U
Cadmium	mg/L	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001	0 001 U
Chromium	mg/L	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0 002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002	0 002 U
Cobalt	mg/L	0.0065	0.0058	0.0044	0.0044	0.001 U	0.00034 J	0.00028 J	0.001 U	0.001 U	0.001 U	0.0017	0 0053	0.0084	0.0081	0.001 U	0.001 U	0.001	0 001 U
Fluoride	mg/L	0 51 J	0.52 J	0.47	0.47	0 62	0 29 J	10 U	0.25	0.31	0.31	1.2 J	0.99	0 53	0.71	0.41 J	0.33	0.4	0.44
Lead	mg/L	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001	0 001 U
L thium	mg/L	0.0021 J	0.0017 J	0.008 U	0.008 U	0.0035 J	0 0064 J	0.0064 J	0.0054 J	0 0055 J	0.0078 J	0.0034 J	0.0039 J	0.0023 J	0.0053 J	0.0051 J	0.0035 J	0.0044	0 0062 J
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0 0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002	0.0002 U
Molybdenum	mg/L	0.03	0.028	0.026	0.026	0.024	0 0057 J	0.0055 J	0.0055 J	0 0046 J	0.005 J	0.013	0.0094 J	0.0072 J	0.0079 J	0.004 J	0.003 J	0.0031	0 0064 J
Radium Total	pci/L	1.4	0.802	0.922 J	1.24 J		3.35	3.18	3.66 J	2.08		0.728	0.698 J			1.26	1.28 J		
Radium-226	pci/L	0.574 J	0.474 J	0.363 J	0.447 J		1.72	1.75	1.86 J	1.15		0.504	0.357 J	0.334 U		0.763	0.578 J	0.506	
Radium-228	pci/L	0 824	0.403 U	0.559 J	0.796 J		1.63	1.43	1.79 J	0.926		0.371 U	0.429 U	0.373 U		0.493	0.698 J	0.571	
Selenium	mg/L	0.0037 J	0.0031 J	0.0027 J	0.0027 J	0.0046 J	0 005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005 U	0.005	0 005 U
Thallium	mg/L	0.00021 J	0.001 U	0.00023 J	0.00022 J	0.00022 J	0 001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U	0.001	0 001 U
Supplemental Parameters																			
Alkal nity Bicarbonate (HCO3)	mg/L		240					230				370				370			
Alkal nity Carbonate (CO3)	mg/L		5 U					5 U				5 U				5 U			
Alkal nity Hydrox de (OH)	mg/L		5 U					5 U				5 U				5 U			
Alkal nity Total	mg/L		240		240	230		230	220	230	230	370	370	300	330	370	410	330	270
Ferr c Iron	mg/L		0.65 J		0.19			5.2 J	2 5			13 J	5.5			6.4 J	3.5		
Ferrous Iron	mg/L		0.1 R		0 058 J			0.1 R	2.8 J			0.1 R	6.5 J			0.1 R	1.7 J		
Iron	mg/L					0.044 J				4.2	4.1			10	3.9			5.7	4.3
Magnesium	mg/L		32		39	28		46	51	50	42	24	25	27	24	37	38	40	38
Manganese	mg/L					0.22				0.58	0.46			0.25	0.45			0 33	0.29
Nitrate as N	mg/L		0.68 J			1.4		0.05 UJ		0.1 U	0.1 U	0.05 UJ		1.5	0.13	0.05 UJ		0.1 U	0.1 U
Nitrite as N	mg/L		0.058 J					0.05 UJ				0.05 UJ				0.05 UJ			
Nitrogen Nitrate-Nitrite	mg/L				0.44				0.05 U				0.062				0.05 U		
Phosphorus (as phosphate)	mg/L		0.031 U		0 31 U	0.31 U		2.1	0.7	0.31 U	0.16 J	0.031 U	0.31 U	0.12 J	0.31 U	0.045	0.15 J	0.14 J	0.31 U
Potassium	mg/L		8.3		9.5	7.2		6	6 6	6.2	4.8 J	2.6	2.4 J	1.6 J	1.9 J	3.3	3.6 J	3 7 J	3.6 J
Sodium	mg/L		58		72	79		200	230	200	180	11	12	6.3	5.5	50	49	58	62
Sample Parameters																			
Dissolved Oxygen	mg/L		1.73		0.33	0.17	0.72		0.37	0.17	0.11	0.99	0.28	1.3	0.34	0.29	0.26	0.79	0.18
Oxidation Reduction Potential	mV		21.6		-69.4	-137.9	-28.9		-129.5	-115.9	-57.5	-97.4	-95.4	64	-86.6	-102.8	-44.4	31.8	-105.7
Eh	mV		221.6	200.0	130.6	62.1	171.1		70.5	84.1	142.5	102.6	104.6	264.0	113.4	97.2	155.6	231.8	94 3
pH	SU		6.77		7.04	7.46	7.31		7.07	7.19	7.31	6 82	7.17	6.83	7.06	6.95	6.91	7.08	7.21
Spec f c Conductance	uS/cm		1493		1574	1491	1017		2109	2201	1967	749	835	460	466	928	1036	856	741
Temperature	deg C		21.1		19.4	17.9	16.7		19.2	18.5	18.1	17	15.7	8.7	14	13.9	13.8	11.6	12.9
Turb dity	NTU		1.74		0.66	3.92	2.26		4.38	1.74	4.77	2.91	2.99	2.31	2.01	2.96	1.45	4.77	1.4

Notes:
CCR = coal combustion res dual
mg/L = m lligrams per liter
mV= millivolts
pci/L= picoCuries per iter
uS/cm = m cro Siemens per centimeter
deg C = degrees Celsius
NTU = Nepheloметric Turbidity Un ts
SU = Standard Units

U = Indicates the result was not detected above the method de ection limit (MDL) for the samp e; the quan itation limit (RL) is provided.
J = Indicates the result s estima ed.
J = Indicates the result s estimated and may be biased high.
UJ = Indica es the result was not de ected above the MDL, the estima ed RL is prov ded.
R = Result was rejected dur ng data validation.

Prepared by: DFSC
Checked by: KMC
Rev ewed by MAH

Appendix A-2: Porewater Analytical Data
CCR Unit Schahfer MSRB, MCWB, and Drying Area
NIPSCO LLC R. M. Schahfer Generating Station
Wheatfield, Indiana

SYS_LOC_CODE		DAPZ-02A	DAPZ-02B	GAPIEZ06	GAPIEZ06	GAPIEZ06
SAMPLE_DATE_yyyy-MM-dd		2020-03-03	2020-03-03	2018-08-09	2018-09-13	2018-10-31
FRACTION		T	T	D	T	T
Chemical Name	Unit					
CCR Appendix III						
Boron	mg/L	7.4	13.8	9.6	8.6	8.3
Calcium	mg/L	489	175	210	210	210
Chloride	mg/L	21.9	119	56	58	55
Fluoride	mg/L	0.16	0.72	0.91	1.1 J	0.92
pH	SU	7.33	7.62	7.51	7.43	9.37
Sulfate	mg/L	1760	2420	750	720	740
Total Dissolved Solids	mg/L	2810	3830		1300	1300
CCR Appendix IV						
Antimony	mg/L	0.001 U	0.001 U	0.0014 J	0.002 U	0.002 U
Arsenic	mg/L	0.001 U	0.0018	0.011	0.011	0.012
Barium	mg/L	0.028	0.033	0.03	0.029	0.03
Beryllium	mg/L	0.0002 U	0.0002 U	0.001 U	0.00052 J	0.001 U
Cadmium	mg/L	0.00052	0.0002 U	0.001 U	0.001 U	0.001 U
Chromium	mg/L	0.002 U	0.0038	0.0023 J+	0.002 U	0.002 U
Cobalt	mg/L	0.0022	0.001 U	0.0004 J	0.00029 J	0.001 U
Fluoride	mg/L	0.16	0.72	0.91	1.1 J	0.92
Lead	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Lithium	mg/L	0.008 U	0.016	0.0041 J	0.0038 J	0.0033 J
Mercury	mg/L	0.0002 U	0.0002 U	0.0002 U	0.0002 U	0.0002 U
Molybdenum	mg/L	0.81	0.063	0.079	0.094	0.11
Selenium	mg/L	0.011	0.001 U	0.001 J	0.005 U	0.005 U
Thallium	mg/L	0.001 U	0.001 U	0.001 U	0.001 U	0.001 U
Supplemental Parameters						
Alkalinity, Bicarbonate (HCO3)	mg/L				170	
Alkalinity, Carbonate (CO3)	mg/L				5 U	
Alkalinity, Hydroxide (OH)	mg/L				5 U	
Alkalinity, Total	mg/L	99.6	224	170	170	160
Ferric Iron	mg/L			2.8 J	2.7 J	0.19
Ferrous Iron	mg/L			0.1 U	0.1 R	0.088 J
Iron	mg/L	0.61	14.2			
Magnesium	mg/L	48.9	18.4	53	51	45
Manganese	mg/L	0.12	0.7			
Nitrate	mg/L			0.031 J		
Nitrate as N	mg/L	0.75 J+	0.1 U		0.05 U	
Nitrite as N	mg/L				0.05 U	
Nitrogen, Nitrate-Nitrite	mg/L					0.038 J
Phosphorus (as phosphate)	mg/L			0.031 U	0.028 J	0.12 J
Potassium	mg/L	59.1	17.5	3.9 J	4.1	5 U
Sodium	mg/L	286	1050	100	110	99
Field Parameters						
Dissolved Oxygen	mg/L	0.61	0.00	1.33	0.7	0.80
Oxidation-Reduction Potential	mV	66.9	-197.4	-130 8	-118 2	-261
Eh	mV	266.9	2.6	69.2	81.8	-61
pH	SU	7.33	7.62	7.51	7.43	9.37
Specific Conductance	uS/cm	3025	4772	1518	1371	1672
Temperature	deg C	9.4	11.7	15.91	16.1	15.1
Turbidity	NTU	28.9	2.74	3.73	4.29	3.4

Notes:
CCR= coal combustion residual
mg/L = milligrams per liter
mV= millivolts
uS/cm = micro Siemens per centimeter
deg C = degrees Celsius
NTU = Nephelometric Turbidity Units
SU = Standard Units
"U" = Indicates he result was not detected above the method detection limit (MDL) for the sample; he quantitation limit (RL) is provided.
"J" = Indicates the result is estimated.
"J+" = Indicates the result is estimated and may be biased high.
"R"= Indicates the result was rejected during data validation.

Prepared by: DFSC
Checked by: KMC
Reviewed by: MAH

APPENDIX B

Groundwater Flow Model Technical Memorandum

TECHNICAL MEMORANDUM

DATE November 12, 2020

TO Danielle Sylvia Cofelice, PE and PJ Nolan, Ph.D.

CC Mark Haney, Joe Gormley, and Rens Verburg

FROM: Ross Bennett, PE(NH) and Brandon Poiencot, PE

GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM

R.M. SCHAHFER GENERATING STATION

1.0 GROUNDWATER MODELING

This Memorandum presents Golder's summary of groundwater modeling activities associated with the evaluation of hydrogeologic conditions and potential remedial designs at the R.M. Schahfer Generating Station in Wheatfield, Indiana (the Site).

A steady state groundwater flow model was developed and calibrated. This memorandum includes the following to document development of the groundwater flow model and includes:

1) Objectives;
2) Groundwater Flow Model Development
3) Model selection (numerical);
4) Model Geometry
5) Boundary Conditions
6) Input Parameters
7) Model Calibration and Verification
8) Parameter Sensitivity analysis
9) Design Simulations
10) Summary

The conceptual model (including geology, hydrology, lithology and analytical data) used to support numerical model development is described Section 2.0 of the CCR Assessment of Corrective Measures Report (Golder, 2019).

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1.1 Objectives

The primary objective of the modeling was to simulate the groundwater flow conditions in the area surrounding R.M. Schahfer Generating Station to support evaluation of the remedy design including the feasibility of Monitored Natural Attenuation (MNA) as part of the assessment of corrective measures process for the Coal Combustion Residuals (CCR) surface impoundments for the Site.

The general scope of the groundwater modeling is to:

- Simulate the groundwater flow regimes on Site;
- Predict the travel times and flow paths of unattenuated particles originating at areas impacted by metals contamination;
- Inform remedy design (e.g., groundwater pump and treat design);
- Inform the groundwater monitored natural attenuation study.

2.0 GROUNDWATER FLOW MODEL DEVELOPMENT

2.1 Numerical Implementation

Golder developed the groundwater flow model for the site using the USGS MODFLOW-2005 Modular Three-Dimensional Finite-Difference Groundwater Flow Model (Harbaugh, 2005). The pre- and post-processing software used for the modeling was Groundwater Vistas (Vistas) Version 7.24 (Environmental Simulations Inc.).

Development of a numerical groundwater flow model involved the following steps:

- Definition of the model geometry including lateral and vertical extent, number and thickness of model layers, and grid spacing
- Definition and placement of model boundary conditions
- Selection of input parameters such as hydraulic conductivity (horizontal and vertical) and precipitation recharge

The following sections describe the steps used to develop the model.

2.2 Model Geometry

The finite-difference model grid location is shown on Attachment A**.** The model area (excluding no-flow cells) is approximately 10,800 feet (along x-axis) by 12,300 feet (along y-axis) at the widest points. The southwest corner of the model grid (model coordinates 0, 0) corresponds with Site coordinates 2165530.5N and 2962863.0 W (Indiana State Plane West). The model grid is oriented parallel with cardinal directions. The model grid contains 504 rows and 432 columns. The grid cell size in the XY direction is uniform, at 25 feet by 25 feet across the entire model domain. Based on geologic and hydrogeologic conditions discussed in Section 2.0 of the CCR Assessment of Corrective Measures Report (Golder, 2019), the model utilizes three layers, with the lowermost layer representing the medium to coarse sand and the upper two layers representing the fine sands. Layers 1 and 2 have the same hydraulic properties, but they were divided to focus boundary condition cells in the upper portion of the aquifer using Layer 1. The base of Layer 3 is the top of the shale bedrock surface and ranges from 597 to 624

feet mean sea level (MSL). The surface topography is based on publicly available lidar data and ranges from 646 to 723 feet MSL. A cross section of model geometry along model column 200 is shown on Attachment B.

2.3 Model Boundary Conditions

Boundary conditions in groundwater models consist of physical and hydraulic boundaries within the model area. Physical boundary conditions are well-defined geologic and hydrologic features that influence groundwater flow patterns. The following sections describe the boundary conditions used in the model.

2.3.1 Constant Head Boundaries

Constant head boundaries (CHB) were assigned along an unnamed stream in Layer 1 in the southwestern corner of the model to recreate the approximate constant hydraulic heads where long-term average stream water levels are expected to remain relatively constant. Constant heads were also used within the basins that are surrounded slurry walls to simulate the average surface water elevations in the basins. The modeled CHBs are shown on Attachment C and summarized on Table B-1.

2.3.2 River Boundary Conditions

River boundary conditions are a head-dependent boundary condition, where the model computes the difference in head between the boundary and the model cell where the boundary is defined. River Boundary condition cells were used for the Kankakee River, as shown in Attachment A. River heads were defined by two USGS gauging stations that fell within the model grid, downstream at USGS station 05517530 in Kouts and upstream at USGS 05517500 at Dunns Bridge. The river width was estimated from satellite imagery, the river bottom elevation was assumed to be three feet lower than the stage, and the bed thickness was assumed to be 10 feet. The hydraulic conductivity of the river was set through calibration at 64.5 feet/day which is slightly lower than aquifer hydraulic conductivities discussed in Section 1.1.2.4.1.

2.3.3 Stream Boundary Conditions

Stream boundary conditions are a simplified version of river boundary conditions where surface water flow is monitored by MODFLOW and water is added or removed from the model based on the stream stage. Stream boundary conditions were used in the Model for Davis Ditch and Stalbaum Ditch, as shown in Attachment C. The stream width was estimated from satellite imagery, the stream bottom elevation was assumed to be 0.5 to 2 feet lower than the stage depending on size of the stream, and the bed thickness was assumed to be 5 feet. The hydraulic conductivity of the river was set at 100 feet/day for Davis Ditch where loosing stream conditions were expected, and at 0.5 feet per day in Stalbaum ditch where perched conditions where assumed to exist. Stream stage was set off two gauging stations in Stalbaum, SW-04 and SW-10. Elsewhere stream stage was estimated from surface elevations and then refined through model calibration.

2.3.4 Drain Boundary Conditions

Drain boundary conditions are a version of river/stream boundary conditions that can only remove water from the model. Drain boundary conditions were used in the Model for intermittent streams and drainage ditches, as shown in Attachment C. The drain width was estimated from satellite imagery, the drain bottom elevation was assumed to be 1 to 2 feet lower than the stage depending on size of the drain, and the bed thickness was assumed to be 1 foot. The hydraulic conductivity of the drains was set at 100 feet/day. Drain stage was estimated from surface elevations and then refined through model calibration.

2.3.5 No Flow Boundaries

No flow boundaries were assigned to the northeast side of the Kankakee River, as shown in Attachment C.

2.3.6 Horizontal Flow Barriers

A hydraulic flow barrier (HFB) or wall is a condition that limits flow between adjacent cells based on an assigned thickness and hydrologic conductivity. To model the slurry walls that are present around ponds, Golder used the HFB boundary condition with an assigned thickness of 1 foot and a horizontal hydraulic conductivity (K) value of 0.0000001 to model slurry walls that surround the basins. The location of HFB boundaries are presented in Attachment C

2.4 Model Input Parameters

The following paragraphs describe the input parameter data used for the model. Golder simulated steady state conditions in the model. Transient dependent parameters such as porosity and storage/storativity were not included in the model calibration process.

2.4.1 Hydraulic Conductivity

Golder based hydraulic conductivity values for the Site model on pumping test analysis results as discussed in Section 6.0 of the AT-01 Aquifer Test Report (Golder, 2020) and summarized in Table B-2. Golder used these results to assign initial hydraulic conductivity values to the groundwater flow model, and to check that the hydraulic conductivity values resulting from model calibration were within the range of values observed. Golder assigned a uniform Kx/Ky hydraulic conductivity value of 215 feet/day and a Kz of 21.5 feet/day across the entire model area for Layers 1 and 2. Layer 3 had a slightly lower hydraulic conductivity of 200 feet/day and a Kz of 20.0 feet/day across the entire model area. These hydraulic conductivities are based on a best fit from model calibration, and are within range of measured conductivities.

2.4.2 Precipitation Recharge

Precipitation recharge is the amount of precipitation that recharges the aquifer, which is generally the precipitation rate minus losses due to runoff and evapotranspiration. Recharge rates calculated for the area were presented in Letsinger (2015) and used in the model. After model calibration a best fit recharge value of 7.1 inches per year (0.00162 feet/day) was established, which was similar to the published rates. A recharge rate of 0.04 inches/year (0.00001 ft/day) was used for the capped landfill areas. Precipitation recharge rates are shown in Attachment D.

2.4.3 Groundwater Extraction and Recharge Wells

Groundwater extraction or recharge wells are present on and adjacent to the Site and were modeled in all versions of the model, as shown in Attachment D. The well field located on the northeast corner of the model contains eight wells that remove a total of 55,343 cubic feet/day. In the central portion of the Site the 5 cooling tower wells and two Miox wells remove a total of 7,701 cubic feet/day, and just west of the Site on well on the adjacent property removes 9,625 cubic feet/day.

3.0 MODEL CALIBRATION AND VERIFICATION

Model calibration consists of successive refinement of the model property assignments and input data from initial assumptions/estimates to improve the fit between observed and model-predicted results. A solution of a groundwater flow model problem requires information including aquifer parameters such as hydraulic conductivity, spatial boundary conditions, and the location and magnitude of applied stresses, such as recharge and drainage.

A solution is attained only when the proper combination of the above parameters and inputs are selected such that the physical problem is accurately represented by the model. The calibrated model described below should be considered a limited hydrologic effort founded on the available information within the context of necessary simplifying assumptions.

The purpose of the calibration effort was to simulate "steady-state" groundwater flow conditions that approximate the general flow patterns inferred from September 2019 groundwater level measurements. The model was calibrated through trial-and-error adjustment of model parameter values and through use of Model-Independent PEST, developed by Watermark Computing, to refine aquifer parameters. PEST allows model input parameters to be adjusted automatically over a given range until the model predicted head matches the observed head with the lowest possible numerical difference, referred to as the calibration residual (Doherty, 2016). Golder set the allowable range of parameter adjustment in PEST to represent realistic values as determined by previously published literature for the region and aquifer tests at the Site.

At each well location, the head residuals were calculated in Groundwater Vistas as the difference between the measured and simulated head values. Positive residual values indicate simulated head values were lower than measured elevations, while negative residual values indicate simulated head values were higher than measured elevations.

As a measure of the accuracy of the model, Groundwater Vistas calculates summary statistics using calculated residuals, which are used as measures of error in the calibrated model. The residual mean (RM) is the arithmetic mean of all calculated residual values. The absolute residual mean (ARM) is the arithmetic mean of the absolute value of the residuals (i.e., all negative residuals are considered positive). The root mean square error (RMSE) is the square root of the mean of the squared value of target residuals. Other statistics such as the residual standard deviation (RSD) (i.e., the square root of the variance [the average of the squared deviations from the mean]), and the sum of squared residuals (SSR) (computed by squaring each residual and adding them together) can also be useful in evaluation of the calibration process. While calibrating the model, Golder selected parameters estimated by PEST that were within a valid range from published literature or Site-specific data that resulted in improved calibration summary statistics.

3.1 Simulated Heads Calibrated to September 2019 Conditions

Measured groundwater elevations for 112 monitoring points from September 2019 were used for calibration, as presented in Table B-3. The model files for September 2019 calibration simulation use the root file name *V12_2019.* The simulated heads and residuals for targets screened in Layer 1 are presented in Attachment F. Based on the simulated contours of groundwater elevation, groundwater flows from the south/southwest toward the Site before it travels to the Kankakee River in the north/northeast.

A comparison of model-predicted versus observed September 2019 potentiometric heads for the 112 selected calibration points resulted in a RM of -0.36 feet and a RMSE of 0.72 feet. The calibration statistics for the model are presented in Table B-4. The RM of -0.36 feet, represents 4.9 percent of the total measured head difference for the model area (approximately 7.41 feet). The absolute residual mean for the model run is 0.57 feet, which is 7.7 percent of the total hydraulic head difference for the entire modeling area. The residual mean and the absolute residual mean are within the generally accepted standard of 10 percent of the total hydraulic head difference for the modeling area.

3.1.1 Water Balance

An effective measure of model calibration is the analysis of the water budget calculated by MODFLOW. The model provides flows across boundaries, flows to and from all sources and sinks, and flows generated by storage. Inflows into the model include:

- Constant head boundaries: 16,716 ft^3/d,
- Rivers: 165,339 ft^3/d,
- Streams: 182,984 ft^3/d and
- Recharge: 545,949 ft^3/d.

Outflows in the model include

- Constant head boundaries: 5,640 ft^3/d,
- Wells: 70,469 ft^3/d,
- Rivers: 474,633 ft^3/d,
- Streams: 400,512 ft^3/d, and
- Drains: 45,574 ft^3/d.

The outflow deficit is 85,842 cubic feet per day (ft^3/d), which is equivalent to error between outflow and inflow estimates of approximately 8.9 percent.

3.1.2 Numerical Model Verification

Model verification was performed using a second water level calibration data set from October 2018. The model input parameter values defined in the September 2019 simulation were maintained. The verification data is presented in Table B-5. The model files for the October 2018 conditions use the root file name *V12.1_2019*. The verification results indicate a RM of 0.33 feet, which represents 4.1 percent of the total hydraulic head difference for the model area. The absolute residual mean for this simulation was 0.52 feet, which is 6.5 percent of the total hydraulic head difference for the entire model area. The verification statistics suggests that the model is calibrated and verified.

4.0 DESIGN SIMULATIONS

Using the calibrated model, Golder used MODPATH (Pollack, 1989) to simulate travel times for particles released from the metals cleaning basin. Particles were started in Layer 3 of the model to simulate the release of contaminants in the deeper part of the aquifer where Boron concentrations exceeded 10 micrograms/liter. Effective porosity of the aquifer was varied between 0.16, 0.3, and 0.46 to represent values within the expected range for medium to fine sand. The length of the particle traces produced by MODPATH along with travel time estimates were used to calculate average groundwater velocities. These travel time calculations are presented in Table B-6.

5.0 GROUNDWATER MODELING SUMMARY

Through standard numerical groundwater modeling procedures, Golder developed a steady state groundwater flow model for the Site that is considered calibrated and verified. This model was utilized to inform the groundwater monitored natural attenuation study by simulating travel times for particles released from the metals cleaning basin.

6.0 REFERENCES

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Harbaugh, Arlen W, 2005. MODFLOW-2005, The U.S. Geological Survey Modular Ground-Water Model—the Ground-Water Flow Process. U.S. Geological Survey Techniques and Methods 6-A16

Letsinger, S. L., 2015, Map of Indiana showing near-surface aquifer recharge: Indiana Geological Survey Miscellaneous Map 92, scale 1:500,000.

Pollock, D.W., 1989 Documentation of computer programs to compute and display pathlines using results from the U.S. Geological Survey modular three-dimensional finite-difference groundwater flow model. U.S. Geological Survey, Open File Report 89-381.

List of Attachments:

Attachment A Model Grid

Attachment B Cross Section of Model Grid

Attachment C Boundary Conditions

Attachment D Precipitation Recharge Zones

Attachment E Active Pumping Wells

Attachment F Model Calibration – September 2019

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Table B-1 Boundary Conditions

Table B-2 Site Pumping Test Results

Table B-3 Measured Groundwater Elevations - September 2019

Table B-4 Calibration Residuals and Summary Statistics - September 2019

Table B-5 Verification Residuals and Summary Statistics – October 2018

Table B-6 Travel Time Simulations

Table B-1 Boundary Conditions
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Constant Head Boundaries

Name	Layer	Reach	Starting Head (ft)	Ending Head (ft)
Intake Settling Basin	1	104	675 0	675.0
Final Settling Basin	1	101	675 0	675.0
Drying Area	1	100	672 0	672.0
Unnamed SW. Stream	1	1	663.17	661.20

Rivers

Name	Layer	Starting Stage (ft)	Starting Bed Elevation (ft)	Ending Stage (ft)	Ending Bed Elevation (ft)	Starting Width (ft)	Ending Width (ft)	Length (ft)	Thickness of Bed (ft)	Hydraulic Conductivity (ft/d)
Kakakanee River	1	651.82	649.10	646.72	644.01	135 28	159.88	24.0	10.0	64.41

Streams

Name	Layer	Starting Stage (ft)	Starting Bed Elevation (ft)	Ending Stage (ft)	Ending Bed Elevation (ft)	Starting Width (ft)	Ending Width (ft)	Length (ft)	Thickness of Bed (ft)	Hydraulic Conductivity (ft/d)	Slope of Channel (ft/ft)
Davis Ditch	1	661.99	659.99	650.29	646.31	20.05	74.80	50	10.0	63.41	0.001
Stalbaum Ditch	1	660.74	659.74	654.5	652.0	10.07	50	28	1.0	50	0.001
Fisher Ditch	1	661.49	659.49	660.88	658.88	30.04	32.08	51	5.0	100	0.001
Stalbaum South Ancillary Ditch	1	661.50	660 0	659.21	657.76	2.06	29.93	31	1.0	10	0.001
Stalbaum East Ancillary Ditch	1	661 0	655.36	657.17	655.21	18.80	30.36	13	5.0	0.1	0.001
Coal Yard Ditch	1	660.7	659.00	660.7	659	5.0	5.0	50	1.0	50	0.001

Drains

Name	Layer	Starting Stage (ft)	Ending Stage (ft)	Starting Width (ft)	Ending Width (ft)	Length (ft)	Thickness of Bed (ft)	Hydraulic Conductivity (ft/d)
Sands Ditch	1	662 0	654.1	1 0	5	38	1	50
W. Sands Drain	1	660 0	655 6	2	2	27	1	50
Hilliard St Ditch	1	659	659	2	2	24	1	10
N. LF Drain	1	661	661	8 8	8 8	50 0	1.0	62.0
S. LF Drain	1	661	661	8 8	8 8	50 0	1.0	62.0
W. LF Drain	1	661	661	5	5	50	2	100

Hydraulic Flow Barriers (Slurry Walls)

Name	First Layer	Last Layer	Thickness (ft)	Hydraulic Conductivity (ft/d)
Intake Settling Basin Slurry Wall	1	3	1	1.00E-07
Final Settling Basin Slurry Wall	1	3	1	1.00E-07
Drying Area Slurry Wall	1	3	1	1.00E-06

Table B-2: Site Pumping Test Results
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Pumping Test Results		Estimated Hydraulic Conductivity (ft/d)
SHALLOW WELLS	*Minimum:*	192
	Maximum:	363
	Arithmetic Mean:	266
DEEP WELLS	*Minimum:*	234
	Maximum:	320
	Arithmetic Mean:	268

Table B-3: Measured Groundwater Elevations - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Well ID	Layer	Groundwater Elevation (ft msl)
GAMW01	1	658.89
GAMW01B	3	658.72
GAMW03	1	659.84
GAMW03B	3	659.26
GAMW07	1	660.74
GAMW07B	3	660.79
GAMW08	1	658.87
GAMW08B	3	658.98
GAMW09	1	659.27
GAMW09B	3	658.87
GAMW12	1	658.64
GAMW12B	3	658.66
GAMW13	1	658.35
GAMW13B	3	658.37
GAMW14	1	658.14
GAMW14B	3	658.12
GAMW15	1	660.35
GAMW15B	3	660.33
GAMW16	1	659.31
GAMW16B	3	659.46
GAMW17B	3	658.92
GAMW18	1	658.92
GAMW18B	3	659.17
GAMW20	1	658.21
GAMW24	1	658.66
GAMW24B	2	658.73
GAMW25	1	658.41
GAMW25B	2	658.41
GAMW26	1	658.33
GAMW26B	3	658.26
GAMW27	1	658.29
GAMW27B	3	658.32
GAMW29	1	657.48
GAMW29B	3	657.48
GAMW30	1	657.42
GAMW30B	3	657.51
GAMW31	1	657.24
GAMW31B	2	657.25
GAMW32	1	657.19
GAMW32B	3	657.15
GAMW33	1	657.04
GAMW33B	3	657.13
GAMW34	1	657.58

Table B-3: Measured Groundwater Elevations - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Well ID	Layer	Groundwater Elevation (ft msl)
GAMW34B	3	657.59
GAMW35B	2	658.16
GAMW36	1	656.67
GAMW36B	3	656.69
GAMW37B	2	657.26
GAMW38	1	657.91
GAMW38B	3	657.91
GAMW39	2	657.88
GAMW39B	3	657.84
GAMW40	1	657.66
GAMW40B	3	657.65
GAMW42	1	658.12
GAMW42B	3	658.13
GAMW43	1	657.83
GAMW43B	3	657.83
GAMW44	1	657.71
GAMW44B	3	657.69
GAMW45B	3	654.52
GAMW46	1	655.22
GAMW46B	3	655.21
GAMW48	1	654.5
GAMW48B	3	654.51
GAMW49	1	656.26
GAMW49B	3	656.34
GAMW50	1	656.37
GAMW50B	3	656.35
GAMW51	1	658.07
GAMW51B	3	658.19
GAMW52	1	657.81
GAMW52B	3	657.82
GAMW53	1	658.04
GAMW53B	3	658.21
GAMW54	1	657.87
GAMW54B	3	657.82
GAMW55B	3	657.78
GAMW56	1	657.81
GAMW56B	3	657.77
GAMW02	1	660.14
GAMW05	1	658.17
GAMW06	1	659.65
GAMW10	1	657.63
GAMW11	1	657.37
GAMW20B	3	658.25

Table B-3: Measured Groundwater Elevations - September 2019
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NIPSCO LLC R. M. Schahfer Generating Station

Well ID	Layer	Groundwater Elevation (ft msl)
MW-1D	3	659.11
MW-1S	2	659.09
MW-2S	2	657.7
MW-3D	3	656.68
MW-4S	2	657.08
MW-5D	3	658.17
MW-5S	2	658.14
MW-6D	3	654.1
MW-6S	2	654.07
MW-7D	3	656.12
MW-7S	2	656.1
MW-8S	3	654.65
MW-9D	3	655.18
MW-9S	3	655.14
MW-10D	3	658.66
MW-10S	1	658.61
MW-11D	3	656.75
MW-11S	2	656.73
MW-12D	3	656.97
MW-12S	2	656.95
MW-13D	3	657.2
MW-13S	2	657.17
MW-14D	2	656.51
MW-14S	2	656.54
SW-4	1	661.48
SW-10	1	660

Table B-4: Calibration Residuals and Summary Statistics - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
Layer 1			
GAMW01	658.89	658.87	0.02
GAMW03	659.84	660.22	-0.38
GAMW07	660.74	662.14	-1.40
GAMW08	658.87	658.87	0.00
GAMW09	659.27	659.05	0.22
GAMW12	658.64	658.58	0.06
GAMW13	658.35	658.50	-0.15
GAMW14	658.14	658.57	-0.43
GAMW15	660.35	662.08	-1.73
GAMW16	659.31	659.11	0.20
GAMW18	658.92	659.30	-0.38
GAMW20	658.21	658.72	-0.51
GAMW24	658.66	659.16	-0.50
GAMW25	658.41	658.67	-0.26
GAMW26	658.33	658.34	-0.01
GAMW27	658.29	658.09	0.20
GAMW29	657.48	658.19	-0.71
GAMW30	657.42	658.20	-0.78
GAMW31	657.24	658.12	-0.88
GAMW32	657.19	657.99	-0.80
GAMW33	657.04	657.92	-0.88
GAMW34	657.58	658.44	-0.86
GAMW36	656.67	657.59	-0.92
GAMW38	657.91	658.24	-0.33
GAMW40	657.66	658.27	-0.61
GAMW42	658.12	658.62	-0.50
GAMW43	657.83	658.54	-0.71
GAMW44	657.71	658.56	-0.85
GAMW46	655.22	654.39	0.83
GAMW48	654.5	654.25	0.25
GAMW49	656.26	656.37	-0.11
GAMW50	656.37	656.86	-0.49
GAMW51	658.07	658.84	-0.77
GAMW52	657.81	657.89	-0.08
GAMW53	658.04	658.21	-0.17
GAMW54	657.87	658.36	-0.49
GAMW56	657.81	658.51	-0.70
GAMW02	660.14	659.81	0.33
GAMW05	658.17	658.77	-0.60
GAMW06	659.65	660.42	-0.77

Table B-4: Calibration Residuals and Summary Statistics - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
GAMW10	657.63	658.34	-0.71
GAMW11	657.37	658.19	-0.82
MW-10S	658.61	659.16	-0.55
SW-4	661.48	657.77	3.71
SW-10	660	659.21	0.79
Layer 2			
GAMW24B	658.73	659.16	-0.43
GAMW25B	658.41	658.67	-0.26
GAMW31B	657.25	658.12	-0.87
GAMW35B	658.16	659.00	-0.84
GAMW37B	657.26	658.24	-0.98
GAMW39	657.88	658.29	-0.41
MW-1S	659.09	659.72	-0.63
MW-2S	657.7	658.54	-0.84
MW-4S	657.08	657.79	-0.71
MW-5S	658.14	658.13	0.01
MW-6S	654.07	654.60	-0.53
MW-7S	656.1	656.26	-0.16
MW-11S	656.73	657.28	-0.55
MW-12S	656.95	657.48	-0.53
MW-13S	657.17	657.95	-0.78
MW-14S	656.54	657.27	-0.73
Layer 3			
GAMW01B	658.72	658.87	-0.15
GAMW03B	659.26	660.22	-0.96
GAMW07B	660.79	660.99	-0.20
GAMW08B	658.98	658.87	0.11
GAMW09B	658.87	659.05	-0.18
GAMW12B	658.66	658.58	0.08
GAMW13B	658.37	658.50	-0.13
GAMW14B	658.12	658.57	-0.45
GAMW15B	660.33	662.22	-1.89
GAMW16B	659.46	659.11	0.35
GAMW17B	658.92	659.55	-0.63
GAMW18B	659.17	659.30	-0.13
GAMW26B	658.26	658.34	-0.08
GAMW27B	658.32	658.13	0.19
GAMW29B	657.48	658.19	-0.71
GAMW30B	657.51	658.20	-0.69
GAMW32B	657.15	657.98	-0.83
GAMW33B	657.13	657.92	-0.79

Table B-4: Calibration Residuals and Summary Statistics - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
GAMW34B	657.59	658.44	-0.85
GAMW36B	656.69	657.59	-0.90
GAMW38B	657.91	658.24	-0.33
GAMW39B	657.84	658.29	-0.45
GAMW40B	657.65	658.27	-0.62
GAMW42B	658.13	658.62	-0.49
GAMW43B	657.83	658.54	-0.71
GAMW44B	657.69	658.56	-0.87
GAMW45B	654.52	653.66	0.86
GAMW46B	655.21	654.39	0.82
GAMW48B	654.51	654.24	0.27
GAMW49B	656.34	656.36	-0.02
GAMW50B	656.35	656.86	-0.51
GAMW51B	658.19	658.84	-0.65
GAMW52B	657.82	657.88	-0.06
GAMW53B	658.21	658.21	0.00
GAMW54B	657.82	658.36	-0.54
GAMW55B	657.78	658.47	-0.69
GAMW56B	657.77	658.51	-0.74
GAMW20B	658.25	658.72	-0.47
MW-1D	659.11	659.72	-0.61
MW-3D	656.68	657.50	-0.82
MW-5D	658.17	658.13	0.04
MW-6D	654.1	654.61	-0.51
MW-7D	656.12	656.26	-0.14
MW-8S	654.65	654.32	0.33
MW-9D	655.18	654.27	0.91
MW-9S	655.14	654.28	0.86
MW-10D	658.66	659.16	-0.50
MW-11D	656.75	657.27	-0.52
MW-12D	656.97	657.48	-0.51
MW-13D	657.2	657.95	-0.75
MW-14D	656.51	657.27	-0.76

Calibration Parameter	Value
Residual Mean (ft)	-0.36
Redsidual Standard Deviation (ft)	0.63
Absolute Residual Mean (ft)	0.57
Residual Sum of Squares	59
RMS Error	0.72
Minimum Residual (ft)	-1.89
Maximum Residual (ft)	3.71

Table B-4: Calibration Residuals and Summary Statistics - September 2019
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
Range of Observations (ft)			7.41
Scaled Residual Standard Deviation			0.085
Scaled Absolute Mean			0.076
Scaled RMS (%)			9.8
Number of Observations			112

Table B-5: Verification Residuals and Summary Statistics – October 2018
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
Layer 1			
GAMW01	659.19	658.87	0.32
GAMW03	660.82	660.22	0.60
GAMW07	659.27	660.62	-1.35
GAMW08	659.06	658.87	0.19
GAMW09	660.34	659.05	1.29
GAMW12	658.84	658.58	0.26
GAMW13	658.72	658.50	0.22
GAMW14	659.55	658.57	0.98
GAMW15	659.10	660.00	-0.90
GAMW16	659.07	659.11	-0.04
GAMW18	659.57	659.30	0.27
GAMW20	659.81	658.72	1.09
GAMW24	659.90	659.16	0.74
GAMW25	659.67	658.67	1.00
GAMW26	659.73	658.34	1.39
GAMW27	659.67	658.09	1.58
GAMW29	658.28	658.19	0.09
GAMW30	658.62	658.20	0.42
GAMW31	658.13	658.12	0.01
GAMW32	657.99	657.99	0.00
GAMW33	657.84	657.92	-0.08
GAMW34	658.47	658.44	0.03
GAMW36	657.71	657.59	0.12
GAMW38	659.19	658.24	0.95
GAMW40	658.76	658.27	0.49
GAMW42	658.40	658.62	-0.22
GAMW43	658.16	658.54	-0.38
GAMW44	657.95	658.56	-0.61
GAMW46	655.25	654.39	0.86
GAMW48	654.68	654.25	0.43
GAMW49	656.86	656.37	0.49
GAMW50	657.22	656.86	0.36
GAMW51	658.42	658.84	-0.42
GAMW52	657.99	657.89	0.10
GAMW53	658.14	658.21	-0.07
GAMW54	658.47	658.36	0.11
GAMW56	658.86	658.51	0.35
GAMW02	660.52	659.81	0.71
GAMW05	658.53	658.77	-0.24
GAMW06	658.63	660.42	-1.79

Table B-5: Verification Residuals and Summary Statistics – October 2018
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
GAMW10	658.61	658.34	0.27
GAMW11	657.97	658.19	-0.22
MW-10S	659.83	659.16	0.67
SW-4	662.48	657.77	4.71
SW-10	660.45	659.21	1.24
Layer 2			
GAMW24B	659.95	659.16	0.79
GAMW25B	659.69	658.67	1.02
GAMW31B	658.14	658.12	0.02
GAMW35B	659.16	659.00	0.16
GAMW37B	658.42	658.24	0.18
GAMW39	659.08	658.29	0.79
MW-1S	659.76	659.72	0.04
MW-2S	658.58	658.54	0.04
MW-4S	657.62	657.79	-0.17
MW-5S	659.47	658.13	1.34
MW-6S	654.83	654.60	0.23
MW-7S	656.72	656.26	0.46
MW-11S	657.55	657.28	0.27
MW-12S	657.68	657.48	0.20
MW-13S	657.97	657.95	0.02
MW-14S	657.49	657.27	0.22
Layer 3			
GAMW01B	659.23	658.87	0.36
GAMW03B	660.31	660.22	0.09
GAMW07B	659.29	660.56	-1.27
GAMW08B	659.12	658.87	0.25
GAMW09B	659.94	659.05	0.89
GAMW12B	657.90	658.58	-0.68
GAMW13B	658.70	658.50	0.20
GAMW14B	658.50	658.57	-0.07
GAMW15B	659.13	660.03	-0.90
GAMW16B	659.14	659.11	0.03
GAMW17B	659.18	658.84	0.34
GAMW18B	660.15	659.30	0.85
GAMW26B	659.66	658.34	1.32
GAMW27B	659.70	658.13	1.57
GAMW29B	658.43	658.19	0.24
GAMW30B	658.71	658.20	0.51
GAMW32B	657.95	657.98	-0.03
GAMW33B	657.89	657.92	-0.03

Table B-5: Verification Residuals and Summary Statistics – October 2018
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
GAMW34B	658.46	658.44	0.02
GAMW36B	657.72	657.59	0.13
GAMW38B	659.21	658.24	0.97
GAMW39B	659.04	658.29	0.75
GAMW40B	658.68	658.27	0.41
GAMW42B	658.41	658.62	-0.21
GAMW43B	658.10	658.54	-0.44
GAMW44B	657.91	658.56	-0.65
GAMW45B	654.52	653.66	0.86
GAMW46B	655.24	654.39	0.85
GAMW48B	654.67	654.24	0.43
GAMW49B	656.94	656.36	0.58
GAMW50B	657.25	656.86	0.39
GAMW51B	658.58	658.84	-0.26
GAMW52B	658.00	657.88	0.12
GAMW53B	658.24	658.21	0.03
GAMW54B	658.42	658.36	0.06
GAMW55B	658.68	658.47	0.21
GAMW56B	658.87	658.51	0.36
GAMW20B	659.85	658.72	1.13
MW-1D	659.76	659.72	0.04
MW-3D	657.50	657.50	0.00
MW-5D	659.47	658.13	1.34
MW-6D	654.86	654.61	0.25
MW-7D	656.70	656.26	0.44
MW-8S	654.80	654.32	0.48
MW-9D	655.15	654.27	0.88
MW-9S	655.14	654.28	0.86
MW-10D	659.83	659.16	0.67
MW-11D	657.52	657.27	0.25
MW-12D	657.64	657.48	0.16
MW-13D	657.96	657.95	0.01
MW-14D	657.46	657.27	0.19

Calibration Parameter	Value
Residual Mean (ft)	0.33
Redsidual Standard Deviation (ft)	0.71
Absolute Residual Mean (ft)	0.52
Residual Sum of Squares	69
RMS Error	0.78
Minimum Residual (ft)	-1.79
Maximum Residual (ft)	4.71

Table B-5: Verification Residuals and Summary Statistics – October 2018
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

Name	Observed Groundwater Elevation (ft msl)	Computed Groundwater Elevation (ft msl)	Residual (ft)
Range of Observations (ft)			7.96
Scaled Residual Standard Deviation			0.09
Scaled Absolute Mean			0.066
Scaled RMS (%)			9.9
Number of Observations			112

Table B-6: Travel Time Simulations
Groundwater Flow Model Technical Memorandum
NIPSCO LLC R. M. Schahfer Generating Station

	Shallow Flow Paths				Deep Flow Paths			
Starting Well	**GAMW-16**	**GAMW-18**	**GAMW-17B**	**GAMW-09B**	**GAMW-16B**	**GAMW-18B**	**GAMW-17B**	**GAMW-09B**
Ending Well	**GAMW-53**	**GAMW-55**	**GAMW-54B**	**GAMW-54B**	**GAMW-53B**	**GAMW-55B**	**GAMW-54B**	**GAMW-54B**
Distance (ft)	**1521**	**1964**	**1200**	**1714**	**1521**	**1964**	**1200**	**1714**
Effective Porosity = 16%								
Travel Time (years)	4.8	11.0	4.5	8.9	5.0	11.0	5.5	9.0
Velocity (ft/year)	317	179	267	193	304	179	218	190
Time to Davis Ditch (years)	5.5	-	-	-	6	-	-	-
Time to property boundry near GAMW46B (years)	-	27	49	41	-	28.5	45	41
Effective Porosity = 30%								
Travel Time (years)	8.5	19.8	8.0	16.0	8.9	20.0	10.0	16.5
Velocity (ft/year)	179	99	150	107	171	98	120	104
Time to Davis Ditch (years)	10	-	-	-	9.9	-	-	-
Time to property boundry near GAMW46B (years)	-	49.8	79	75	-	51.5	80	76
Effective Porosity = 46%								
Travel Time (years)	13.0	31.0	12.0	25.0	13.5	29.0	15.0	25.0
Velocity (ft/year)	117	63	100	69	113	68	80	69
Time to Davis Ditch (years)	15	-	-	-	15	-	-	-
Time to property boundry near GAMW46B (years)	-	76.8	122	117	-	77	130	120

Notes:
ft = feet



NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRD, MCWD, AND DRYING AREA
MICHIGAN CITY GENERATING STATION

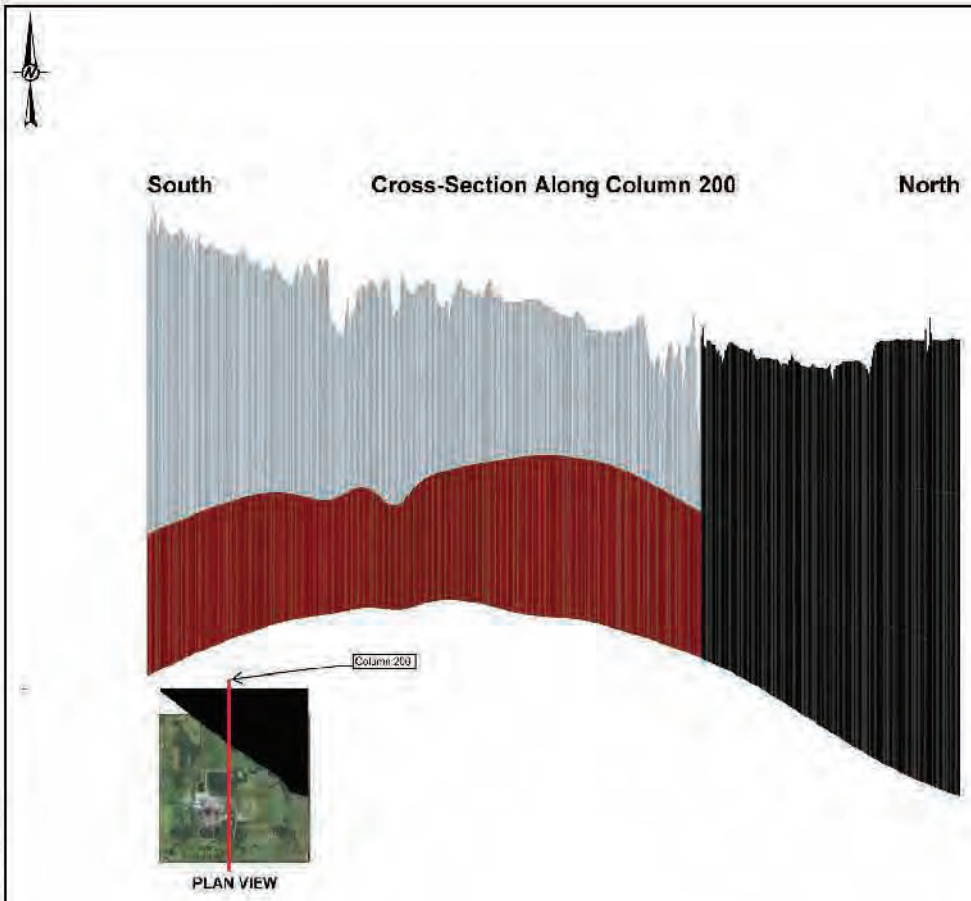
MODEL GRID

GOLDER

DESIGNED RWB

APPROVED RWB

19121587 A



CLIENT
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

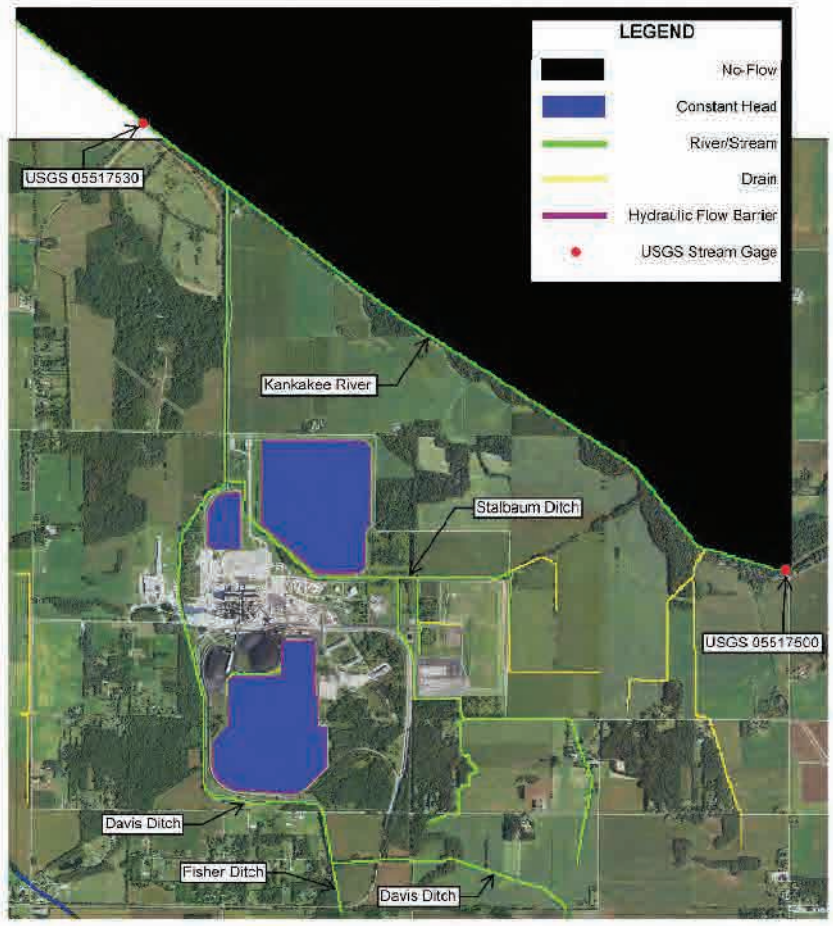
PROJECT
GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRD, MCWD, AND DRYING AREA
NIPSCO R.M. SCHAHFER GENERATING STATION

TITLE
CROSS SECTION OF MODEL GRID

CONSULTANT
GOLDER

DESIGNED	RWB
PREPARED	SR
REVIEWED	BP
APPROVED	RWB

PROJECT NO. 19121587 | B



NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

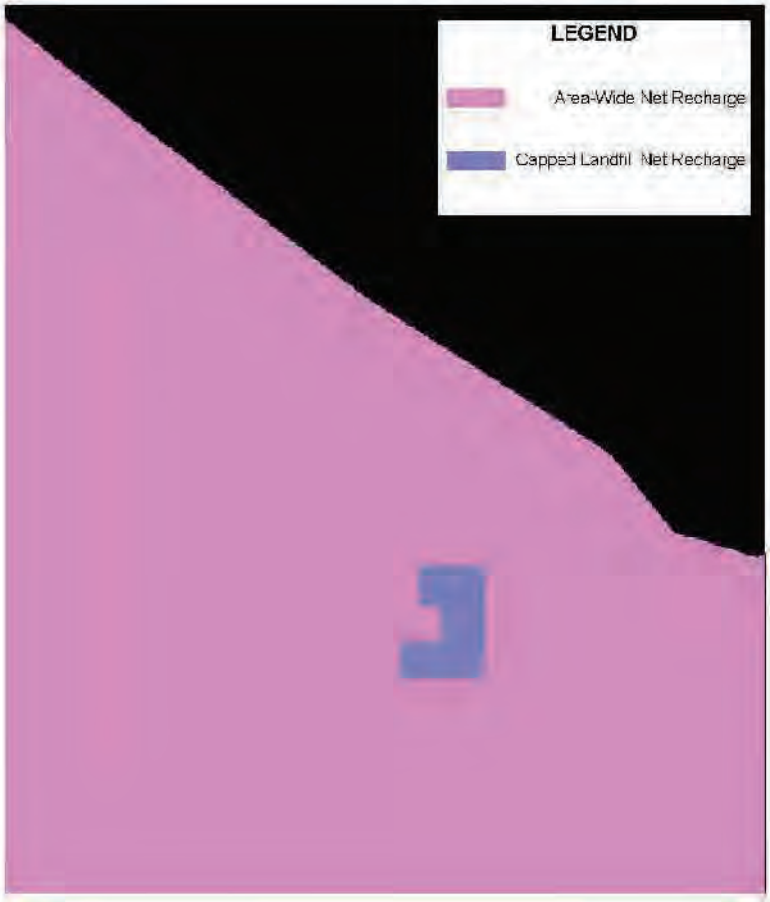
GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRB, MCWD, AND DRYING AREA
MICHIGAN CITY GENERATING STATION

BOUNDARY CONDITIONS

GOLDER

DESIGNED: RWB

PROJECT NO.: 19431587 | CONTROL: - | REV: - | C



NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRD, MCWD, AND DRYING AREA
MICHIGAN CITY GENERATING STATION

PRECIPITATION RECHARGE ZONES

GOLDER

DESIGNED RWS

APPROVED MKG

19121587 D



LEGEND

Well Location

0 700 1,400

Feet

1:1 - 1,667 (at)

NOTE(S)

1. DASTON MODEL VER. 2018.

REFERENCE(S)

1. COORDINATE SYSTEM: NAD 1983 STATE PLANE INDIANA WEST FIPS 1302 FEET
2. 2019 NAIP IMAGERY RETRIEVED FROM ESRI ARCGIS ONLINE IMAGERY SERVICE LAYER

CLIENT

NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT

GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRD, MCWD, AND DRYING AREA
NIPSCO R.M. SCHAHFER GENERATING STATION

TITLE

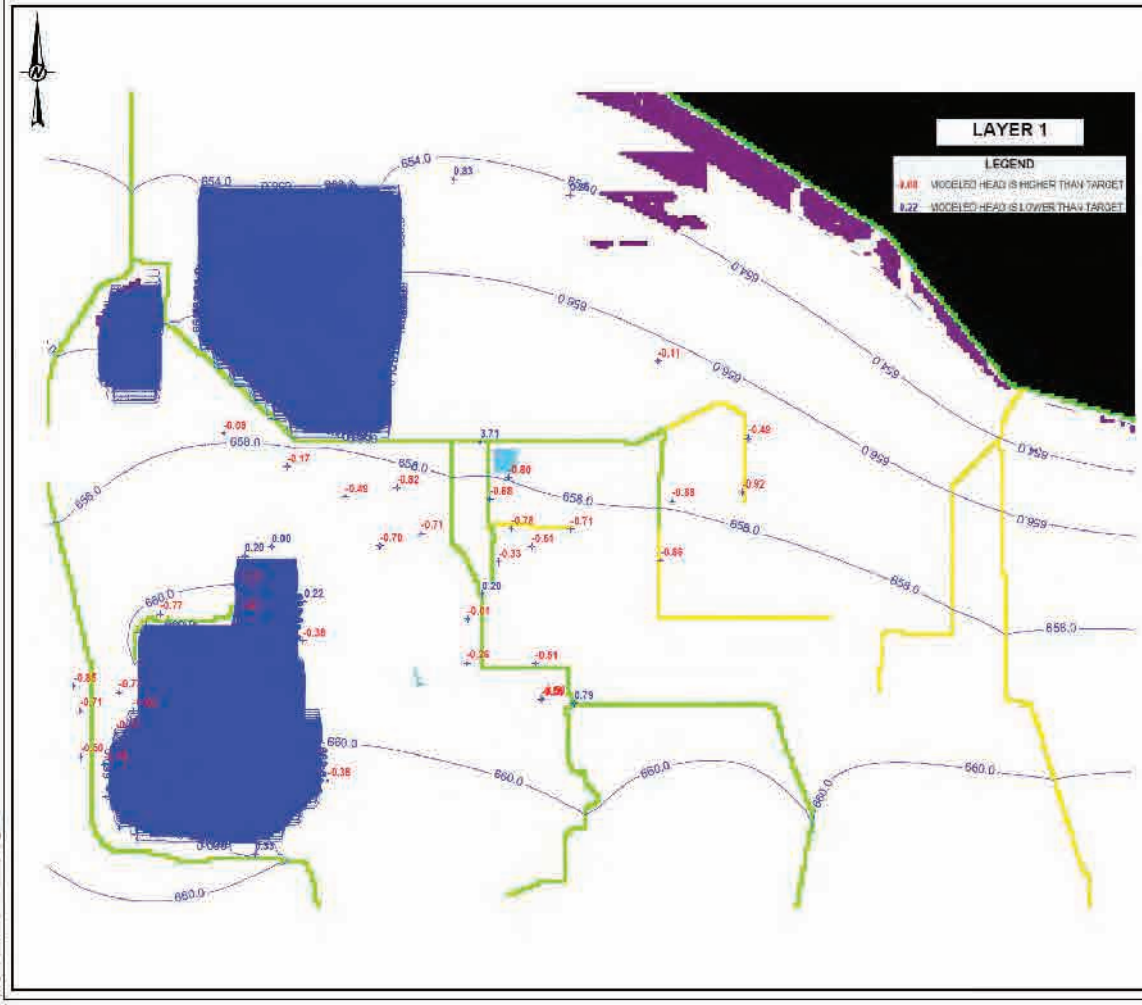
ACTIVE PUMPING WELLS

CONSULTANT

GOLDER

YYYY-MM-DD	2020-12-09
DESIGNED	RWS
PREPARED	SR
REVIEWED	RP
APPROVED	DAH

PROJECT NO. 19121567 | CONTROL - | REV. - | FIGURE NO. E



NOTE(S):
1. BASED ON MODEL V12_2019

REFERENCE(S):
1. COORDINATE SYSTEM: WGS 1984 WEB MERCATOR AUXILIARY SPHERE

CLIENT:
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC

PROJECT:
GROUNDWATER FLOW MODEL TECHNICAL MEMORANDUM
MSRB, MCWD, AND DRYING AREA
NIPSCO R.M. SCHAHFER GENERATING STATION

TITLE:
MODEL CALIBRATION - SEPTEMBER 2019

CONSULTANT:
GOLDER

YYYY-MM-DD	2020-12-22
DESIGNED	RWB
PREPARED	SR
REVIEWED	RP
APPROVED	RWB

PROJECT NO.: 19121567 | CONTROL: - | REV.: - | FIG. NO.: F



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APPENDIX P

Corrective Measures Selection of Remedy, Semi-Annual Progress Reports #21-01, #21-02, and #22-01

TECHNICAL MEMORANDUM

DATE April 9, 2021 **Project No.** 19121567

TO Joe Kutch, Team Leader Environmental Compliance
Northern Indiana Public Service Company LLC (NIPSCO LLC)

CC Jeff Loewe (NIPSCO LLC), Joe Gormley, Danielle Sylvia Cofelice, Jim Peace, Krysta Cione

FROM Mark Haney **EMAIL mhane @golder.com**

**RE: NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC
R.M. SCHAHFER GENERATING STATION, CCR UNIT CONSISTING OF MSRB, MCWB AND DA
CORRECTIVE MEASURES SELECTION OF REMEDY, SEMI-ANNUAL PROGRESS REPORT 21-01**

On behalf of Northern Indiana Public Service Company LLC (NIPSCO LLC) and in conformance with 40 Code of Federal Regulations (CFR) §257.97(a), Golder Associates Inc. (Golder) has prepared this semi-annual progress report for the NIPSCO LLC R.M. Schahfer Generating Station (RMSGS or Site), 2723 E 1500 N Road, Wheatfield, Jasper County, Indiana. This report summarizes progress toward selection of a Corrective Measures remedy for three Coal Combustion Residuals (CCR) impoundments (the Material Storage Runoff Basin MSRB , Metal Cleaning Waste Basin MCWB , and Drying Area DA), collectively referred to as the Multi-Cell Unit (MCU). Specifically, this semi-annual progress report summarizes actions completed since the submittal of the third semi-annual progress report on October 9, 2020.

In April 2019, Golder prepared an Assessment of Corrective Measures (ACM) to address detections of Appendix IV parameters in groundwater downgradient of the MCU above the groundwater protection standards (GWPS). Specifically, the ACM addressed cobalt due to a detection at a Statistically Significant Level (SSL) in groundwater. In addition, the ACM addressed boron because of detections above the Indiana Department of Environmental Management (IDEM) 4 milligrams per liter (mg/l) groundwater screening level and based on information suggesting the United States Environmental Protection Agency (USEPA) is considering adding it to the Appendix IV list. The ACM was prepared in conformance with applicable requirements of 40 CFR §257.96 and was certified by a qualified Indiana-licensed professional engineer on April 19, 2019. Following certification, the ACM was placed in the facility operating record and NIPSCO LLC posted it to their publicly-accessible CCR website.

As discussed in the ACM, NIPSCO LLC plans to close the MCU by removal in accordance with 40 CFR §257.102(c). NIPSCO LLC initially submitted a Closure Application to IDEM in April 2019 and has since provided supplemental information in response to IDEM review comments. NIPSCO LLC continues to refine the Closure Application, which is currently under additional review by IDEM. Modifications to the closure approach and Closure Application will impact the ACM and selection of a groundwater corrective measure(s).

The ACM initially identified eight potential Corrective Measure alternatives to be considered for implementation following excavation and closure of the CCR Unit. However, Golder determined that additional data and further evaluation were required to select a remedy from among these options. Concurrent with IDEM review of the Closure Application and further development by NIPSCO LLC of the closure detailed design, Golder performed

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additional field investigations to collect Site-specific data and conducted analyses of recent and historical information. The following remedy selection-related activities have been performed in the past six months:

- In October 2020, Golder collected groundwater data from three piezometers installed in April 2020, northwest of the CCR Unit. Golder used these data along with data from May, July, August, and September 2020 to refine groundwater flow maps in the near vicinity of the CCR Unit. Golder will continue to collect groundwater surface elevation and groundwater quality data during succeeding monitoring events.
- In November 2020, Golder completed a monitored natural attenuation (MNA) Tier I-III evaluation report[1] that summarized its evaluations of the feasibility, mechanisms, rates, and stability of MNA as a potential remedy for groundwater impacts at the Site.
- In November 2020, Golder prepared a summary of the results of groundwater modeling activities associated with the evaluation of hydrogeologic conditions and potential remedial designs.[2]
- In November 2020, Golder prepared an ACM Addendum[3] (ACM Addendum 1) to supplement the findings of the 2019 ACM and provide further details of Golder s evaluation of the potential corrective measures for RMSGS. ACM Addendum 1 specifically focused on the following requirements under 40 CFR §257.96(c):

  "The assessment under paragraph (a) of this section must include an analysis of the effectiveness of potential corrective measures in meeting all of the requirements and objectives of the remedy as described under §257.97 addressing at least the following:
  1) *The performance, reliability, ease of implementation, and potential impacts of appropriate potential remedies including safety impacts, cross-media impacts, and control of exposure to any residual contamination;*
  2) *The time required to begin and complete the remedy;*
  3) *The institutional requirements, such as state or local permit requirements or other environmental or public health requirements that may substantially affect implementation of the remedy(s)."*

  In addition, ACM Addendum 1 included copies of the MNA Tier I-III evaluation report and the summary of groundwater modeling activities.
- From October 2020 through April 2021, NIPSCO LLC continued to refine the Closure Application/Design of the MCU in response to IDEM comments.

Following final closure design for the MCU and IDEM acceptance of the Closure Application as complete, which is expected in summer 2021, Golder will prepare another Addendum to the ACM (ACM Addendum 2) to reevaluate the list of potential corrective measures identified in the ACM based on their compatibility with the final closure design.

Throughout the spring-fall 2021 timeframe, Golder will continue to collect and evaluate additional information and perform an engineering review of the potential Corrective Measures, consistent with timing and implications of the Closure Application IDEM review, NIPSCO LLC public meeting, and IDEM approval processes. For these reviews, Golder will place emphases on identifying critical data gaps, understanding and reacting to impacts of

[1] Golder, November 2020. Monitored Natural Attenuation Evaluation for the R.M. Schahfer Generating Station

[2] Golder, November 12, 2020. Groundwater Flow Model Technical Memorandum for the R M. Schahfer Generating Station

[3] Golder, November 30, 2020. CCR Assessment of Corrective Measures Report Addendum for the R.M. Schahfer Generating Station

newly gathered information on previous assumptions and/or conclusions, identifying and researching applicability of emerging technologies, and monitoring changing conditions and future plans for the Site and their impacts on the remedy process. Golder will summarize these additional evaluations along with a summary NIPSCO LLC's progress toward selection of remedy for groundwater Corrective Measures at the MCU in the next semi-annual progress report.

TECHNICAL MEMORANDUM

DATE October 11, 2021 **Project No.** 19121567

TO Joe Kutch, Team Leader - Environmental Compliance
Northern Indiana Public Service Company LLC

CC Jeff Loewe (NIPSCO LLC), Joe Gormley, Danielle Sylvia Cofelice, Jim Peace, Krysta Cione

FROM Mark Haney **EMAIL mhane @golder.com**

**RE: NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC
R.M. SCHAHFER GENERATING STATION, CCR UNIT CONSISTING OF MSRB, MCWB AND DA
CORRECTIVE MEASURES SELECTION OF REMEDY, SEMI-ANNUAL PROGRESS REPORT 21-02**

On behalf of Northern Indiana Public Service Company LLC (NIPSCO) and in conformance with 40 Code of Federal Regulations (CFR) §257.97(a), Golder Associates Inc. (Golder), *a member of WSP,* has prepared this semi-annual progress report for the NIPSCO R.M. Schahfer Generating Station (RMSGS or Site), 2723 E 1500 N Road, Wheatfield, Jasper County, Indiana. This report summarizes progress toward selection of a Corrective Measures remedy for three Coal Combustion Residuals (CCR) impoundments (the Material Storage Runoff Basin MSRB , Metal Cleaning Waste Basin MCWB , and Drying Area DA), collectively referred to as the Multi-Cell Unit (MCU). Specifically, this semi-annual progress report summarizes actions completed since the submittal of the fourth semi-annual progress report on April 9, 2021.

In April 2019, Golder prepared an Assessment of Corrective Measures (ACM) to address detections of Appendix IV parameters in groundwater downgradient of the MCU above the groundwater protection standards (GWPS). Specifically, the ACM addressed cobalt due to a detection at a Statistically Significant Level (SSL) in groundwater. In addition, the ACM addressed boron because of detections above the Indiana Department of Environmental Management (IDEM) 4 milligrams per liter (mg/l) groundwater screening level and based on information suggesting the United States Environmental Protection Agency (USEPA) is considering adding it to the Appendix IV list. The ACM was prepared in conformance with applicable requirements of 40 CFR §257.96 and was certified by a qualified Indiana-licensed professional engineer on April 19, 2019. Following certification, the ACM was placed in the facility operating record and NIPSCO posted it to their publicly accessible CCR website.

In November 2020, based upon informal feedback from USEPA officials regarding their interpretation of ACM content, Golder prepared an Addendum (hereinafter Addendum 1) to the 2019 ACM in accordance with the requirements of 40 CFR §257.96. Addendum 1 was certified by a qualified Indiana-licensed professional engineer on November 30, 2020. Following certification, the ACM was placed in the facility operating record and NIPSCO posted it to their publicly accessible CCR website. In July 2021, consistent with changes to the MCU closure design and resultant impacts on remedy alternatives, Golder prepared a second Addendum (hereinafter Addendum 2) to the 2020 ACM in accordance with the requirements of 40 CFR §257.96. Addendum 2 was certified by a qualified Indiana-licensed professional engineer on July 29, 2021. Following certification, the ACM was placed in the facility operating record and NIPSCO posted it to their publicly accessible CCR website. For the purposes of this progress report the initial ACM and all Addenda are collectively referred to simply as the ACM.

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As discussed in the ACM, NIPSCO plans to close the MCU by removal in accordance with 40 CFR §257.102(c). NIPSCO initially submitted a Closure Application to IDEM in April 2019. On May 13, 2021, NIPSCO submitted a final Closure Application to IDEM that modified the closure design and provided supplemental information in response to IDEM review comments. The final Closure Application, which included a low permeability cap design, is currently under review by IDEM. The final Closure Application includes modifications to the closure approach and low permeability cap design that impacts the ACM findings and final selection of a groundwater corrective measure(s).

The ACM initially identified eight potential Corrective Measure alternatives to be considered for implementation following excavation and closure of the MCU. However, Golder determined that additional data and further evaluation were required to select a remedy from among these options. Concurrent with IDEM review of the Closure Application and further development by NIPSCO of the closure detailed design, Golder performed additional field investigations to collect Site-specific data and conducted analyses of recent and historical information. The following remedy selection-related activities have been performed in the past six months:

- From April 2021 through May 2021, NIPSCO LLC continued to refine the Closure Application/Design of the MCU in response to IDEM comments and submitted the final Closure Application on May 13, 2021.
- Following submittal of the final Closure Application and confirmation that IDEM was in general agreement with the modified cap design, Golder prepared the MCU Assessment of Corrective Measures - Addendum 2 to reevaluate the list of potential corrective measures identified in the ACM based on their compatibility with the modified cap design. ACM Addendum 2 revised and updated information provided in the predecessor documents and incorporated the low permeability cap design in all corrective measures alternatives identified in the ACM and Addendum 1, effectively eliminating four of the ACM alternatives from further consideration.
- From August through October 2021, Golder performed additional engineering evaluations of the four remaining alternatives taking into consideration the low permeability cap design and its impact on the selection of remedy for groundwater Corrective Measures.
- During the spring 2021, Golder collected groundwater samples from the monitoring well network and evaluated the resulting analytical data to confirm plume extent and stability. Golder sampled groundwater monitoring wells for CCR and monitored natural attenuation (MNA) parameters from April 14 to April 27, 2021.

Throughout the fall 2021 - spring 2022 timeframe, Golder will continue to collect and evaluate additional information and perform an engineering review of the potential Corrective Measures, consistent with timing and implications of the Closure Application IDEM review, NIPSCO LLC public meeting, and IDEM approval processes. For these reviews, Golder will place emphases on identifying critical data gaps, understanding and reacting to impacts of newly gathered information on previous assumptions and/or conclusions, identifying and researching applicability of emerging technologies, and monitoring changing conditions and future plans for the Site and their impacts on the remedy process. Golder will summarize these additional evaluations along with a summary NIPSCO LLC s progress toward selection of remedy for groundwater Corrective Measures at the MCU in the next semi-annual progress report.

TECHNICAL MEMORANDUM

DATE April 10, 2022 **Project No.** 21508844

TO Joe Kutch, Team Leader - Environmental Compliance
Northern Indiana Public Service Company LLC

CC Jeff Loewe (NIPSCO), Joe Gormley, Danielle Sylvia Cofelice, Jim Peace, Cody Johnson

FROM Mark Haney **EMAIL mark.haney@wsp.com**

RE: NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC
R.M. SCHAHFER GENERATING STATION, CCR UNIT CONSISTING OF MSRB, MCWB AND DA
CORRECTIVE MEASURES SELECTION OF REMEDY, SEMI-ANNUAL PROGRESS REPORT #22-01

On behalf of Northern Indiana Public Service Company LLC (NIPSCO) and in conformance with 40 Code of Federal Regulations (CFR) §257.97(a), Golder Associates USA Inc., *a member of WSP,* (Golder) has prepared this semi-annual progress report for the NIPSCO R.M. Schahfer Generating Station (RMSGS or Site), 2723 E 1500 N Road, Wheatfield, Jasper County, Indiana. This report summarizes progress toward selection of a Corrective Measures remedy for three Coal Combustion Residuals (CCR) impoundments (the Material Storage Runoff Basin [MSRB], Metal Cleaning Waste Basin [MCWB], and Drying Area [DA]), collectively referred to as the Multi-Cell Unit (MCU). Specifically, this semi-annual progress report summarizes actions completed since the submittal of the fifth semi-annual progress report on October 11, 2021.

In April 2019, Golder prepared an Assessment of Corrective Measures (ACM) to address detections of Appendix IV parameters in groundwater downgradient of the MCU above the groundwater protection standards (GWPS). Specifically, the ACM addressed cobalt due to a detection at a Statistically Significant Level (SSL) in groundwater. In addition, the ACM addressed boron because of detections above the Indiana Department of Environmental Management (IDEM) 4 milligrams per liter (mg/l) groundwater screening level and based on information suggesting the United States Environmental Protection Agency (USEPA) was considering adding it to the Appendix IV list. The ACM was prepared in conformance with applicable requirements of 40 CFR §257.96 and was certified by a qualified Indiana-licensed professional engineer on April 19, 2019. Following certification, the ACM was placed in the facility operating record and NIPSCO posted it to their publicly accessible CCR website.

In November 2020, based upon informal feedback from USEPA officials regarding their interpretation of ACM content, Golder prepared an Addendum (hereinafter Addendum #1) to the 2019 ACM in accordance with the requirements of 40 CFR §257.96. Addendum #1 was certified by a qualified Indiana-licensed professional engineer on November 30, 2020. Following certification, the ACM was placed in the facility operating record and NIPSCO posted it to their publicly accessible CCR website. In July 2021, consistent with changes to the MCU closure design and resultant impacts on remedy alternatives, Golder prepared a second Addendum (hereinafter Addendum #2) to the 2020 ACM in accordance with the requirements of 40 CFR §257.96. Addendum #2 was certified by a qualified Indiana-licensed professional engineer on July 29, 2021. Following certification, the ACM was placed in the facility operating record and NIPSCO posted it to their publicly accessible CCR website. In March 2022, based on 1) feedback provided from USEPA to other utilities regarding Part A Demonstrations and

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interpretations about the applicability of certain proposed groundwater remedies, and 2) USEPA's lack of movement in regard to adding boron to the Appendix IV list, Golder began preparation of a third Addendum (hereinafter Addendum #3) to the previous ACM Addenda. ACM Addendum #3 was prepared in accordance with the requirements of 40 CFR §257.96. Although Addendum #3 refers to and, in part, relies on information used in the preparation of previous Addenda, it is a standalone document upon which the Selection of Remedy (SOR) process will be conducted. For the purposes of this progress report the initial ACM and all Addenda are collectively referred to simply as the ACM.

As discussed in the ACM, NIPSCO plans to close the MCU by removal in accordance with 40 CFR §257.102(c). NIPSCO initially submitted a Closure Application to IDEM in April 2019. On May 13, 2021, NIPSCO submitted what was intended to be a final Closure Application to IDEM that modified the closure design and provided supplemental information in response to IDEM review comments. This latest version of the Closure Application that included a low permeability cap design, was reviewed by IDEM, which in turn issued a request for additional information in March 2022. The previous and current versions of the Closure Application include modifications to the closure approach and low permeability cap design that impact the ACM findings and final selection of a groundwater corrective measure(s).

Earlier versions of the ACM initially identified eight potential Corrective Measure alternatives to be considered for implementation following excavation and closure of the MCU. However, Golder determined that additional data and further evaluation were required to refine and select one or more potential remedies from among these options. Concurrent with IDEM's prior review of the earlier and latest version of the Closure Application and further development by NIPSCO of the closure detailed design, Golder performed additional evaluations of potential corrective measures alternatives. As noted, USEPA's stated interpretations to other utilities regarding the appropriateness of certain potential groundwater remedies was the impetus for preparation of ACM Addendum #3. The following remedy selection-related activities have been performed in the past six months:

- Upon receipt of an additional request from IDEM for further information regarding the most recent (i.e., May 2021) Closure Application, NIPSCO LLC is continuing to refine the Closure Application/Design of the MCU in response to IDEM comments. In addition, NIPSCO will be meeting with IDEM in April 2022 in an attempt to 1) better understand IDEM's request for additional information about the Closure Application, and 2) gain its expedited approval.
- Following further evaluation of remedy alternatives in response to USEPA actions at other CCR sites, Golder began and completed preparation of ACM Addendum #3. This addendum focuses the scope of the corrective action response to cobalt in groundwater, which is the only Appendix IV constituent found at an SSL outside the MCU. Boron, which is not an Appendix IV constituent, but had been considered in Addenda #1 and #2 as discussed above, was removed from the list of constituents of concern.
- During the Fall 2021 Golder collected groundwater samples from the monitoring well network and evaluated the resulting analytical data to confirm plume extent and stability. Golder sampled groundwater monitoring wells for CCR Appendix III and IV parameters from September 15 to October 1, 2021.
- Golder began preliminary work on the draft Selection of Remedy report based on the results of ACM Addendum #3.

Throughout the spring – summer 2022 timeframe, Golder will continue to collect and evaluate additional information and perform, additional engineering evaluations of the alternatives identified in ACM Addendum #3 consistent with timing and implications of IDEM's Closure Application review and approval processes. Golder will summarize these additional evaluations along with a summary NIPSCO LLC's progress toward selection of remedy for groundwater Corrective Measures at the MCU in the next semi-annual progress report.

https://golderassociates.sharepoint.com/sites/nipscoccrgwmonitoring/shared documents/rmsgs/reports/selection of remedy progess updates/22-01/rmsgs selection of remedy semi annual progress report 6.docx

APPENDIX Q

Annual RCRA CCR Unit Inspection Report Waste Disposal Area – December 2021

GOLDER
MEMBER OF WSP

REPORT

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

Annual RCRA CCR Unit Inspection Report
Waste Disposal Area – Surface Impoundment

Submitted to:

Northern Indiana Public Service Company, LLC
2723 East 1500 North, Wheatfield, Indiana USA 46392

Submitted by:

Golder Associates Inc.
15851 South US 27, Suite 50 Lansing, Michigan, USA 48906

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21496761

December 31, 2021

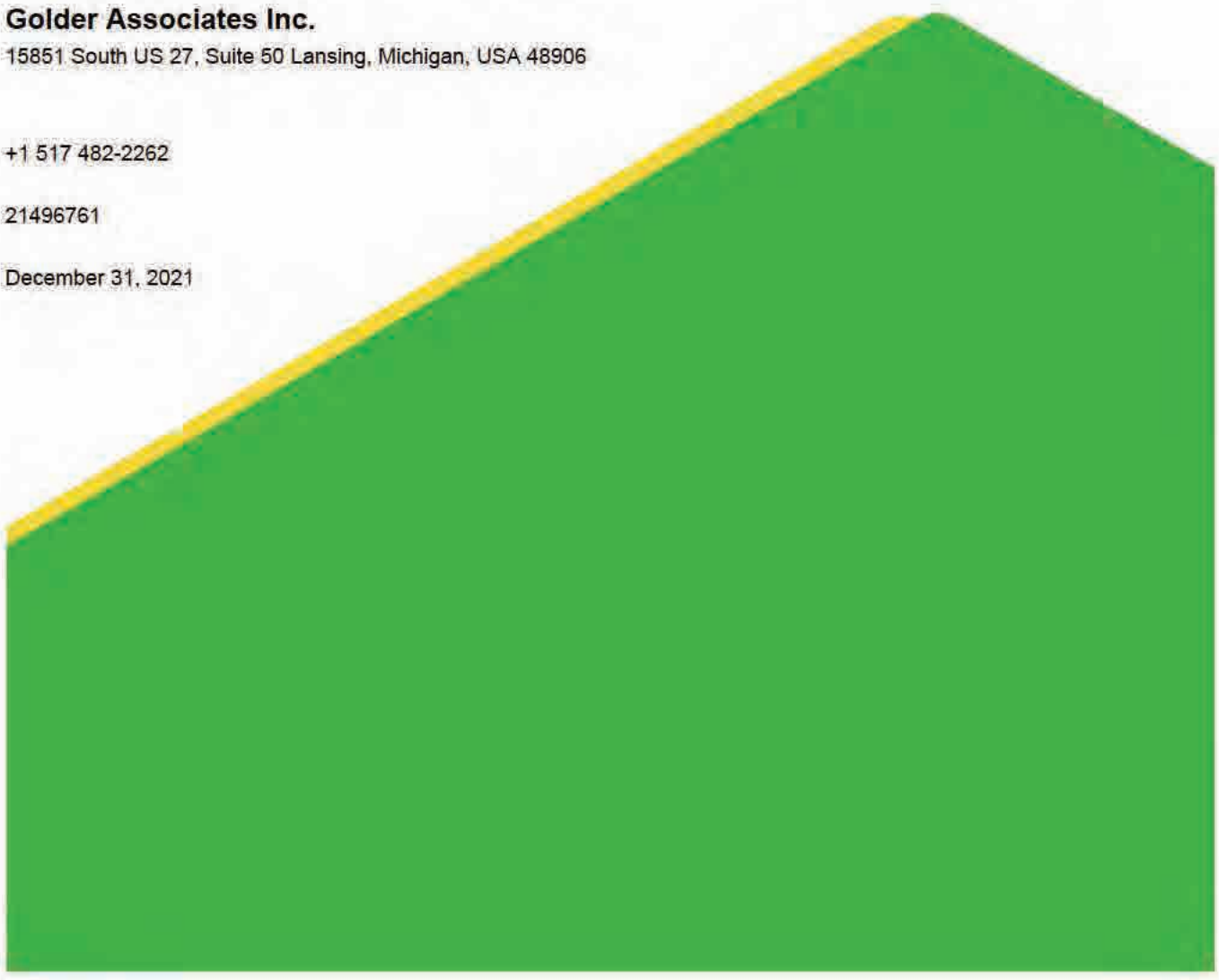


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1.0 INTRODUCTION

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 surface impoundments to have those units inspected on an annual basis by a qualified professional engineer in accordance with 40 CFR 257.83(b)(1). The annual qualified professional engineer inspections are required to be completed and the results documented in inspection reports (per 40 CFR 257.83(b)(2)) for CCR surface impoundments. Golder Associates USA Inc. (Golder) was retained by Northern Indiana Public Service Company, LLC (NIPSCO) to perform the annual inspection of the Waste Disposal Area (WDA), a CCR surface impoundment located at the R.M. Schahfer Generating Station (RMSGS, Site).

This report presents the results of the 2021 annual inspection of the WDA CCR surface impoundment unit at the RMSGS, located in Wheatfield, Jasper County, Indiana. The inspection was conducted to comply with §257.83 of the CCR Rule.

Per 40 CFR 257.83(b)(1), Golder reviewed available information regarding the status and condition of the CCR unit and performed an onsite visual inspection which was conducted on October 26, 2021. The objectives of the inspection included the following:

- Review of Operational Records (as applicable, see Section 3):
  - Design and construction information.
  - Results of previous structural stability assessments.
  - Results of previous annual inspections.
- A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit and appurtenant structures.
- A visual inspection of hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit for structural integrity and continued safe and reliable operation.

In accordance with §257.83(b)(2), this inspection report has been prepared by a qualified professional engineer documenting the operational records review, visual inspection, and identifying the following since the previous annual inspection:

- Any changes in geometry of the CCR surface impoundment since the previous annual inspection.
- The location and type of existing instrumentation and the maximum recorded readings for each instrument since the previous annual inspection.
- The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection.
- The storage capacity of the impounding structure at the time of inspection.
- The approximate volume of the impounded water and CCR at the time of 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 and appurtenant structures.

- Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.

2.0 FACILITY DESCRIPTION

The WDA was designed by Sargent & Lundy Engineers of Chicago, Illinois in 1982. The WDA, located in the southwest region of RMSGS, is unlined and formed by an approximately 17-foot-high perimeter earth-fill dike with slurry trench core that encloses an area of approximately 83 acres. The embankment crest has a nominal elevation of 681 feet above mean sea level (amsl), but surveyed crest elevations range from 680.0 to 682.3 feet amsl. The WDA receives primarily bottom ash/boiler slag from the generating station through pipes located at the northern end of the unit. Most of the deposited ash/slag is located in the northern half of the WDA. Due to size of the unit and settling/depositional properties of the materials, very little, if any, ash/slag is present in the southern half of the WDA. The east side of the WDA is common with the west side of the adjacent Recycle Settling Basin (RSB). Water exits the WDA via an overflow weir (standpipe), to the RSB, or through the auxiliary spillway located at the northwest side. The overflow weir is located at the southern end of the east side of the WDA. The WDA and the RSB are hydraulically connected and the water level within these impoundments will seek equilibrium when the water level is above the invert elevation of the standpipe connecting the impoundments. A survey of the WDA was performed by Marbach, Brady and Weaver, Inc. in December 2011 (Marbach, 2011).

The auxiliary spillway was modified in 2017 to allow for an increased invert elevation to account for the maximum flood levels. The modified spillway was operational in 2018. The modifications included removal of the former closed-conduit spillway and construction of a concrete open-channel spillway with a concrete down-chute and riprap armoring at the toe of the embankment. The completed spillway has an invert elevation of 677.5 feet amsl.

The revised analysis performed for the WDA's modified spillway and the actions by NIPSCO to operationally control the water surface elevation, satisfy the requirements of 40 CFR 257.82 (Golder, November 2017).

3.0 BACKGROUND AND DOCUMENT REVIEW SUMMARY

The existing reports reviewed for this assessment are summarized below.

Table 1: Summary of Background Document Review

Document	Date	Author
Various construction drawings	1982	Sargent & Lundy Engineers
Assessment of Dam Safety of Coal Combustion Surface Impoundments, NIPSCO, RM Schahfer Generating Station	July 2010	CDM for the EPA
Report on Inspection of The Waste Disposal Area	January 2011	Golder Associates Inc.
Final Hazard Classification Review Report – NIPSCO Schahfer Generating Station	January 2011	Golder Associates Inc.
Embankment Elevation Survey, Waste Disposal Area and Recycle Pond, NIPSCO Schahfer Generating Station	December 2011	Marbach, Brady and Weaver, Inc.

Document	Date	Author
Schahfer Spillway Hydrologic and Hydraulic Evaluation	December 2011	Golder Associates Inc.
Final Geotechnical Investigation and Embankment Stability Analyses	June 2012	Golder Associates Inc.
Report on Inspection of The Waste Disposal Area	September 2012	Golder Associates Inc.
Construction in a Floodway Permit Application, NIPSCO R.M. Schahfer Generating Station,	November 2012	Golder Associates Inc.
Basin Operation, Maintenance, and Inspection Plan, NIPSCO R. M. Schahfer Generating Station,	February 2013	Golder Associates Inc.
Emergency Action Plan, Final Settling Basin (FSB), Intake Settling Basin (ISB), Waste Disposal Area (WDA), Recycle Basin (RB), Northern Indiana Public Service Company (NIPSCO), R.M. Schahfer Generating Station	February 2013	Golder Associates Inc.
State of Indiana Department of Natural Resources (DNR), Certificate of Approval, After-the-Fact, Construction in a Floodway	April 23, 2013	State of Indiana DNR
Report on Inspection of The Waste Disposal Area	April 2014	Golder Associates Inc.
Construction Observation Documentation Report, Surface Water Basin Erosion Repairs, NIPSCO R.M. Schahfer Generating Station	October 2014	Golder Associates Inc.
Northern Indiana Public Service Company R.M. Schahfer Generating Station – First Annual RCRA CCR Unit Inspection Report – January 2016 – Waste Disposal Area – Surface Impoundment	January 2016	Golder Associates Inc.
NIPSCO, R.M. Schahfer Generating Station, Hazard Potential Classification Assessment and Visual Inspection Report – RCRA CCR Units	September 2016	Golder Associates Inc.
NIPSCO – R.M. Schahfer Generating Station, Waste Disposal Area, History of Construction	September 2016	Golder Associates Inc.
Statement of Certification, NIPSCO RMSGS, Liner Design Criteria for Existing CCR Surface Impoundments	September 2016	Golder Associates Inc.

Document	Date	Author
NIPSCO R.M. Schahfer Generating Station, CCR Surface Impoundment Inflow Design Flood Control System Plan	October 2016	Golder Associates Inc.
NIPSCO, R.M. Schahfer Generating Station, Waste Disposal Area, Structural Stability and Safety Factor Assessment	October 2016	Golder Associates Inc.
Waste Disposal Area Spillway Improvement Drawings – Bid Drawings, NIPSCO, RMSGS	August 2017	Golder Associates Inc.
Northern Indiana Public Service Company, R.M. Schahfer Generating Station – Second Annual RCRA CCR Unit Inspection Report – January 2017 – Waste Disposal Area – Surface Impoundment	January 2017	Golder Associates Inc.
Weekly Inspection Reports	2017- October 2020	NIPSCO
WDA Bathymetric Survey	2017	DLZ
Amendment to the R.M. Schahfer Generating Station Inflow Design Flood Control System Plan – Hydraulic Evaluation of the Waste Disposal Area Auxiliary Spillway	November 2017	Golder Associates Inc.
Northern Indiana Public Service Company, R.M. Schahfer Generating Station – Third Annual RCRA CCR Unit Inspection Report – January 2018 – Waste Disposal Area – Surface Impoundment	January 2018	Golder Associates Inc.
Northern Indiana Public Service Company, R.M. Schahfer Generating Station – Fourth Annual RCRA CCR Unit Inspection Report – January 2019 – Waste Disposal Area – Surface Impoundment	January 2019	Golder Associates Inc.
Northern Indiana Public Service Company, R.M Schahfer Generating Station – Fifth Annual RCRA CCR Unit Inspection Report – January 2020 – Waste Disposal Area – Surface Impoundment	January 2020	Golder Associates Inc.
Northern Indiana Public Service Company, R.M Schahfer Generating Station – Sixth Annual RCRA CCR Unit Inspection Report – Waste Disposal Area – Surface Impoundment	December 31, 2020	Golder Associates Inc.

4.0 2021 VISUAL INSPECTION

The 2021 onsite inspection of the WDA was performed by Ms. Tiffany Johnson, P.E. and Mr. Peter Joplin, P.E. of Golder on October 26, 2021. Both Ms. Johnson and Mr. Joplin are Professional Engineers, licensed in the State of Indiana. Golder's inspectors were directed by Mr. Joseph Kutch, Manager, Environmental Compliance with NiSource Corporate Services.

The inspection provides the following information as stipulated in 40 CFR 257.83(b)(2):

- Any changes in geometry of the CCR surface impoundment since the previous annual inspection.
  - None observed.
- The location and type of existing instrumentation and the maximum recorded readings for each instrument since the previous annual inspection.
  - There is currently no instrumentation in place designed to monitor structural stability of the WDA.
- The approximate minimum, maximum, and present depth and elevation of the impounded water and CCR since the previous annual inspection.
  - Maximum: approximately 677.5 feet above mean sea level (based on invert elevation of the improved spillway (Golder, November 2017)
  - Minimum: approximately 676.5 feet above mean sea level (based on visual observation)
  - Present Depth: approximately 12.5 feet (based on visual observation at overflow weir staff gauge, approximate elevation of 676 ft amsl)
- The storage capacity of the impounding structure at the time of inspection.
  - 1,530 acre-feet (based on review of available information)
- The approximate volume of the impounded water and CCR at the time of inspection.
  - Impounded water = approximately 183,880,000 gallons (from NIPSCO based on 13-feet depth, no significant change from 2020)
  - CCR = approximately 640,000 cubic yards (from 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 and appurtenant structures.
  - None were observed at the time of the inspection. However, in July 2021, NIPSCO informed Golder of a seep located on the northwest corner of the WDA downstream embankment slope. Golder inspected the location on July 30, 2021 and after visual inspection and interviews with workers on site it was determined that the likely cause of the seep was a leak in the Unit 14 Yard Sump Pit pipe which had broken at near the same spot in February of 2020. A subsequent investigation confirmed the leak in the pipe and the section was replaced in August of 2021 and backfilled. There were no issues observed in this area during the October 26, 2021 inspection.
- Any other change(s) which may have affected the stability or operation of the impounding structure since the previous annual inspection.
  - None were observed.

Based on visual observations made on October 26, 2021, the overall condition of the WDA is acceptable. No structural weaknesses or safety issues were observed within the upstream, downstream, crest, or hydraulic

structures of the WDA. Based on visual observations made on October 26, 2021, there were no visual conditions identified that would negatively impact the operation of the WDA.

5.0 CLOSING

This report has been prepared in general accordance with normally accepted civil engineering practices to fulfill the Resource Conservation and Recovery Act (RCRA) reporting requirements in accordance with 40 CFR 257.83(b). Based on our review of the information provided by NIPSCO and on Golder's on-site visual inspection, the overall condition of the WDA is acceptable. Golder'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. Golder cannot attest to the condition of subsurface or submerged structures.

Sincerely,

Golder Associates Inc.



Peter Joplin, P.E.
Senior Project Engineer

Tiffany D. Johnson, P.E.
Principal and Indiana P.E. #11500730

https://golderassociates.sharepoint.com/sites/153481/project files/5 technical work/wda/2021_nipsco ccr wda rcra inspection report_final.docx