CCR COMPLIANCE
GROUNDWATER MONITORING AND CORRECTIVE ACTION
ANNUAL REPORT
HUNTLEY LANDFILL AND SOUTH SETTLING POND

Prepared for:

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Table of Contents

List of Tables

List of Figures

List of Appendices

Executive Summary

In response to the newly adopted Part A elements (effective September 28, 2020) of the Coal Combustion Residuals (CCR) Rule (or Rule), this Executive Summary has been incorporated into the annual report per the specific provisions as codified in Title 40 Code of Federal Regulations (CFR) §257.90(e)(6). These provisions require that an up-front overview of the current status (covering the immediately preceding calendar year) of groundwater monitoring and corrective action programs be provided in a concise and focused manner for each CCR unit at the facility. Accordingly, the following paragraphs document the respective groundwater monitoring status (for Calendar Year 2020) of the South Settling Pond and the Landfill at the Huntley Generating Station, owned by Huntley Power LLC. Tables, figures and/or appendices referenced in the discussions below are included at the end of the report and further support the text (Sections 2.0 and 3.0) in the main body of the report.

Huntley South Settling Pond

As shown on Figure 1, the Huntley South Settling Pond maintains a CCR groundwater monitoring network comprised of four wells, including one upgradient location (Well CCR-3) and three downgradient locations (Wells A-2, CCR-1, and CCR-2). For Calendar Year 2020, the South Settling Pond entered and ended the period in the Assessment Monitoring Program. The South Settling Pond has remained in Assessment Monitoring since being transitioned in early 2018 following confirmed statistically significant increases (SSIs) for several CCR Appendix III constituents, including boron, fluoride, pH, and sulfate in the downgradient wells (see Table 1). In 2019, arsenic was confirmed in downgradient Well CCR-2 at a statistically significant level (SSL) above the corresponding CCR groundwater protection standard (GWPS). An Assessment of Corrective Measures (ACM) was initiated in April 2019 and completed in August 2019, making use of the 60-day extension provision contained in §257.96(a). As documented in the ACM and subsequent semiannual progress reports (January 2020 and July 2020; included in Appendix A), remedy selection has not yet taken place and is inter-dependent with other activities currently ongoing under the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP). Ultimately, remedy selection under the CCR Rule and the BCP will be a coordinated effort in order to arrive at a remedial strategy that is jointly responsive and compliant with the objectives of both programs.

Relative to Assessment Monitoring for the current reporting period, sampling events were conducted in March, April, and October 2020 (see Table 2). The March 2020 event yielded an elevated lithium result in downgradient Well CCR-2 that was eventually confirmed in July 2020 as an SSL above the corresponding GWPS. An ACM was initiated in October 2020, and is targeted for completion in early March 2021, again utilizing the 60-day extension provision in order to make use of forthcoming supplemental information from BCP field investigations that were

conducted in late 2020. Documentation regarding the lithium SSL notification (July 2020) and subsequent correspondence regarding the ACM are provided in Appendix B. As noted above for the arsenic ACM, remedy selection specific to lithium will also be tied to the remedial solution developed for the South Settling Pond under the BCP. Lithium and arsenic in downgradient Well CCR-2 are the only Appendix IV constituents confirmed to date as SSLs above the respective GWPSs for the South Settling Pond. The 2020 monitoring events also showed several Appendix III constituents at values above background in the downgradient wells, including Well A-2 (fluoride and sulfate), Well CCR-1 (fluoride and pH), and Well CCR-2 (boron, fluoride, and pH).

Summarizing the above discussion with specific regard to the new criteria established in §257.90(e)(6), the following elements are noted for the South Settling Pond:

- §257.90(e)(6)(i) – At the beginning of the current annual reporting period, the South Settling Pond was operating under the CCR Assessment Monitoring Program.
- §257.90(e)(6)(ii) – At the conclusion of the current annual reporting period, the South Settling Pond remained in the CCR Assessment Monitoring Program.
- §257.90(e)(6)(iii) – The following SSIs for Appendix III constituents were observed in the downgradient wells during the current annual reporting period:
  - Well A-2 – fluoride and sulfate
  - Well CCR-1 – fluoride and pH
  - Well CCR-2 – boron, fluoride, and pH.

  This same general subset of Appendix III constituents triggered the South Settling Pond into the CCR Assessment Monitoring Program in early 2018, wherein it has since remained.
- §257.90(e)(6)(iv) – Lithium was measured at an SSL in downgradient Well CCR-2 during the March 2020 monitoring event, with required notification of such provided in July 2020. The corresponding ACM was initiated in October 2020
- §257.90(e)(6)(v) – Remedy selection under §257.97 associated with the previously completed ACM for arsenic (August 2019) is pending the outcome of ongoing investigation activities under the NYSDEC BCP.
- §257.90(e)(6)(vi) – Remedy implementation for arsenic under §257.98 will follow accordingly once remedy selection has been completed.

Huntley Landfill

As shown on Figure 2, the Huntley Landfill is a captive disposal site and maintains a CCR groundwater monitoring network consisting of eight wells, including one upgradient location (Well MW-12D) and seven downgradient locations (Wells CCR-4, CCR-5, CCR-6, MW-7D,

MW-11D, MW-13D, and MW-14D). For Calendar Year 2020, the Landfill entered and ended the period in the Assessment Monitoring Program. The Landfill has remained in Assessment Monitoring since being transitioned in early 2018 following confirmed SSIs for several CCR Appendix III constituents, including boron, calcium, chloride, sulfate, and total dissolved solids (TDS) in the downgradient wells (see Table 3). Assessment Monitoring events conducted in January and April 2020 did not reveal any Appendix IV constituents at concentrations representing an SSL above the corresponding GWPSs (see Table 4). However, the October 2020 event did provide a preliminary result for radium in downgradient Well MW-13D that is elevated above the GWPS. This result is currently being evaluated in order to gather additional information to determine if the value is potentially anomalous or does represent a valid measurement. These 2020 events continued to show several Appendix III constituents at values above background in the downgradient wells, including boron, TDS, and sulfate (all wells); calcium (all wells except Well MW-11D); chloride (all wells except Well MW-7D); pH (Wells MW-7D and MW-14D); and fluoride (Well CCR-5). No groundwater-related findings to date have triggered the landfill into an Assessment of Corrective Measures.

Summarizing the above discussion with specific regard to the new criteria established in §257.90(e)(6), the following elements are noted for the Huntley Landfill:

- §257.90(e)(6)(i) – At the beginning of the current annual reporting period, the Huntley Landfill was operating under the CCR Assessment Monitoring Program.
- §257.90(e)(6)(ii) – At the conclusion of the current annual reporting period, the Huntley Landfill remained in the CCR Assessment Monitoring Program.
- §257.90(e)(6)(iii) – The following SSIs for Appendix III constituents were observed in the downgradient wells during the current annual reporting period:
  - Well CCR-4 – boron, calcium, chloride, sulfate, and TDS
  - Well CCR-5 – boron, calcium, chloride, fluoride, sulfate, and TDS
  - Well CCR-6 – boron, calcium, chloride, sulfate, and TDS
  - Well MW-7D – boron, calcium, pH, sulfate, and TDS
  - Well MW-11D – boron, chloride, sulfate, and TDS
  - Well MW-13D – boron, calcium, chloride, sulfate, and TDS
  - Well MW-14D – boron, calcium, chloride, pH, sulfate, and TDS.

  This same general subset of Appendix III constituents triggered the Huntley Landfill into the CCR Assessment Monitoring Program in early 2018, wherein it has since remained.
- §257.90(e)(6)(iv) – No SSLs of any Appendix IV constituents have been recorded to date. Elevated radium in downgradient Well MW-13D, detected during the October

2020 monitoring event, is still being evaluated as of the issuance of this current annual report.

- §257.90(e)(6)(v) – The Huntley Landfill is not currently subject to corrective action or any associated remedy selection under §257.97.
- §257.90(e)(6)(vi) – The Huntley Landfill is not currently subject to corrective action or any associated remedy implementation under §257.98.

1.0 Introduction

Title 40 Code of Federal Regulations (CFR) §257.90 mandates that existing Coal Combustion Residuals (CCR) landfills and surface impoundments, also known as CCR units, be subject to groundwater monitoring and corrective action requirements as further detailed in §257.91 through §257.98. These requirements are part of the overall CCR Rule (or Rule) which was published in the Federal Register on April 17, 2015 and which became effective on October 19, 2015. Specific obligations for Owners and Operators of existing CCR units regarding the preparation of "Annual Groundwater Monitoring and Corrective Action Reports (Annual Report)" are outlined in §257.90(e)(1-5). The first Annual Report was completed on January 31, 2018, and provided information, per the Rule to address the following aspects for the preceding calendar year:

- Document the status of the groundwater monitoring and corrective action program for the respective CCR units;
- Summarize key actions completed;
- Describe any problems encountered and actions taken to resolve the problems; and
- Offer a projection of key activities for the upcoming year.

At a minimum, the Annual Report must contain the following information to the extent applicable and available, and beginning with the current report, must also address the items contained in §257.90(e)(6) in the form of an Executive Summary:

- A map, aerial image, or diagram showing the CCR unit and all background/upgradient and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program;
- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;
- In addition to all the monitoring data obtained under §257.90 through §257.98, a summary including the number of groundwater samples that were collected for analysis for each background/upgradient and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;
- A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and
- Any other information required to be included as specified in §257.90 through §257.98.

The Huntley Generating Station, owned by Huntley Power LLC, was a former coal-fired power plant located in Tonawanda, New York. The facility ceased electric generating operations on February 29, 2016, subsequent to the effective date of the Rule. The Rule applies to this facility due to the management/disposal of CCR materials resulting from the previous coal combustion activities. CCR units associated with station operations include the Huntley Landfill and the South Settling Pond. Each of these CCR units has a dedicated groundwater monitoring well network that meets the requirements of §257.91 with regard to number and appropriate locations of wells (certification previously provided under separate cover).

In summary, this fourth Annual Report has been prepared to comply with the requirements of §257.90(e), addressing both of the Huntley Station's CCR units with respect to the groundwater monitoring and corrective actions undertaken during Calendar Year 2020. This Annual Report and all subsequent reports thereto will be placed in the Station's operating record per §257.105(h)(1), noticed to the State Director per §257.106(h)(1), and posted to the publicly accessible internet site per §257.107(h)(1).

The previously prepared third Annual Report (covering the 2019 Calendar Year reporting period) was completed on January 31, 2020 and placed into the facility operating record on this same date. Subsequent notification to the State Director and posting to the publicly accessible website was completed on March 1, 2020.

2.0 South Settling Pond

2.1 Groundwater Monitoring Network

The CCR groundwater monitoring system for the Huntley South Settling Pond is comprised of four wells, including Well CCR-3 (upgradient), and Wells A-2, CCR-1, and CCR-2 (downgradient). The locations of the wells are shown on the attached Figure 1, along with depiction of the generalized groundwater flow direction in the area of the pond. Each of these wells was already existing, and no new wells were added nor were any existing wells abandoned/replaced during the 2020 reporting period.

2.2 2020 Data Collection

Following completion of the Assessment of Corrective Measures (ACM) for arsenic in August 2019, and until such time when remedy selection has been completed, the South Settling Pond will remain in Assessment Monitoring. Accordingly, for the 2020 reporting period samples were collected and analyzed for Appendix III and Appendix IV constituents as required, during the March, April, and October monitoring events. Results from the 2020 sampling events are summarized in Tables 1 and 2, covering Appendix III and Appendix IV constituents, respectively. As shown in Table 2, arsenic in downgradient Well CCR-2 persists at concentrations representing a statistically significant level (SSL) above the groundwater protection standard (GWPS). Also, during the March 2020 event, lithium was measured in Well CCR-2 at a concentration with subsequent confirmation of this value as an SSL above the GWPS. This determination triggered the performance of a separate lithium-specific ACM (further discussed in Section 2.4), which is currently ongoing. Several other Appendix IV analytes were detected amongst all downgradient wells at varying levels above and below calculated background values, but none approaching the established GWPSs. Assessment Monitoring for the South Settling Pond will continue into 2021.

2.3 2020 Monitoring Program Transitions

During 2020, there were no transitions between monitoring programs, with the South Settling Pond remaining in the CCR Assessment Monitoring Program.

2.4 2020 Corrective Actions

As noted above, the ACM for arsenic was completed in August 2019. Since that time, required semiannual progress reporting [per §257.96(a)] has been subsequently performed, including reports generated in January and July 2020. Copies of these progress reports are provided in Appendix A, and include discussion of the inter-dependency of CCR remedy selection with other activities ongoing to support investigative work under the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP).

Following confirmation and the July 2020 notification (contained in Appendix B) of the lithium SSL in downgradient Well CCR-2, performance of a lithium-specific ACM was initiated in October 2020. This ACM is targeted for completion in early-March 2021, utilizing a 60-day extension to enable supplemental data from the BCP field investigation (conducted in late 2020) to be reviewed and assimilated into the ACM. Copies of the ACM initiation notification and associated 60-day extension justification are also contained in Appendix B.

2.5 2021 Projected Activities

Moving into 2021, the South Settling Pond will continue in the Assessment Monitoring Program, and the lithium-specific ACM will be completed in early March 2021. Semiannual progress reporting [per §257.97(a)] will continue relative to remedy selection for arsenic, and will be initiated for lithium remedy selection. As acknowledged, the CCR remedy selection process (for both arsenic and lithium) is invariably linked and significantly dependent upon the activities and outcomes of the BCP investigation work and associated remedial solutions developed for that program. Based on current information, it is anticipated that documented findings from the BCP Remedial Investigation will be provided to NYSDEC during May 2020. That information will serve as starting point for initial consideration and evaluation of possible technologies and remedial options under both programs.

3.0 Landfill

3.1 Groundwater Monitoring Network

The CCR groundwater monitoring system for the Huntley Landfill is comprised of eight wells, including Well MW-12D (upgradient) and Wells CCR-4, CCR-5, CCR-6, MW-7D, MW-11D, MW-13D, and MW-14D (downgradient). The locations of the wells are shown on Figure 2, along with depiction of the generalized groundwater flow direction in the area of the disposal site. Each of these wells was already existing, and no new wells were added nor were any existing wells abandoned/replaced during the 2020 reporting period.

3.2 2020 Data Collection

Following its transition in early 2018, the Huntley Landfill continued in the CCR Assessment Monitoring Program during the 2020 reporting period. Accordingly, samples were collected and analyzed for Appendix III and Appendix IV constituents as required, during the January, April and October 2020 monitoring events. Results from the 2020 sampling events are summarized in Tables 3 and 4, covering Appendix III and Appendix IV constituents, respectively. As shown in Table 4, radium was detected at an elevated concentration in downgradient Well MW-13D during the October 2020 monitoring event. This datapoint (which is an order of magnitude above historical trends in this well) remains under review while additional information is being evaluated and gathered (including data from re-sampling of the well) in order to more definitively determine if the result is potentially erroneous or does represent a valid measurement. No other Appendix IV constituents from the 2020 sampling events were measured at concentrations approaching/ exceeding the corresponding site-specific GWPSs, although. Additionally, detected concentrations of nearly all Appendix III constituents do remain above calculated background in each of the downgradient wells (see Table 3). Assessment Monitoring for the Landfill will continue into 2021.

3.3 2020 Monitoring Program Transitions

During 2020, there were no transitions between monitoring programs, with the Huntley Landfill remaining in the CCR Assessment Monitoring Program.

3.4 2020 Corrective Actions

During 2019, there were no corrective actions undertaken.

3.5 2021 Projected Activities

Assessment Monitoring activities will continue for the Huntley Landfill during 2021, with continued review of Appendix III/Appendix IV constituent concentrations and comparison against calculated background and established groundwater protection standards. In addition, evaluation

of the elevated radium concentration in Well MW-13D will be concluded in early 2021, and appropriate actions taken (if needed) based upon the outcome.

Tables

Table 1
Huntley Power LLC
Huntley South Settling Pond – Groundwater Analytical Data
CCR Appendix III Constituents

Monitoring Well	Date Sampled	Total Boron (mg/L)	Total Calcium (mg/L)	Total Chloride (mg/L)	Total Fluoride (mg/L)	Total Dissolved Solids (mg/L)	Sulfate (mg/L)	pH (S.U.)
		Calculated Background						
		2.41	715	286	0.24	2884	996	5.98-7.30
CCR-3 (Upgradient)	9-Dec-15	1.09	405	229	0.19	2230	602	7.08
	11-Mar-16	1.22	442	262	0.21	2590	855	6.38
	24-May-16	1.05	564	247	< 0.20	2600	739	6.93
	23-Sep-16	1.30	465	254	< 0.20	2600	732	6.83
	30-Nov-16	1.28	545	254	0.24	2530	687	6.75
	28-Mar-17	1.16	569	260	< 0.20	2720	836	6.64
	19-May-17	1.80	454	< 2	0.20	2680	896	6.80
	21-Sep-17	1.72	458	246	< 0.20	2680	802	6.83
	5-Oct-17	1.00	318	219	< 0.20	2430	615	6.70
	25-May-18	1.30	313	235	< 0.20	2640	808	7.02
	3-Oct-18	1.22	354	243	< 0.20	2560	791	6.17
	18-Jan-19	1.23	479	256	< 0.20	2640	934	6.76
	21-May-19	1.22	389	244	< 0.20	2850	902	6.85
	27-Sep-19	1.19	357	230	< 0.20	2580	727	6.98
	13-Mar-20	1.49	451	236	< 0.20	2590	894	6.99
	29-Apr-20	1.47	473	223	< 0.20	2510	873	6.86
	7-Oct-20	1.53	502	222	< 0.20	2620	838	6.81
A-2 (Downgradient)	9-Dec-15	0.85	599	134	0.53	2830	1900	7.20
	11-Mar-16	0.86	558	139	0.41	2900	1790	6.99
	24-May-16	1.09	756	124	0.23	3000	1450	7.63
	23-Sep-16	0.75	498	121	< 0.20	2900	1480	6.77
	30-Nov-16	0.82	705	123	0.46	2770	1610	6.77
	28-Mar-17	0.58	705	109	< 0.20	2720	1510	6.88
	19-May-17	0.72	753	121	0.54	2740	1610	6.80
	21-Sep-17	0.78	624	115	0.28	2660	1560	6.91
	5-Oct-17	0.49	369	103	0.30	2790	1560	6.71
	25-May-18	0.72	427	96	0.34	2660	1440	6.38
	3-Oct-18	0.53	420	88	0.38	2400	1150	7.43
	18-Jan-19	0.48	504	89	0.41	2500	1470	7.51
	21-May-19	0.53	535	85	0.53	2560	1450	7.06
	30-Sep-19	0.42	443	79	0.32	2290	1220	6.56
	13-Mar-20	0.57	602	91	< 0.20	2420	1460	6.95
	29-Apr-20	0.68	650	93	0.34	2570	1560	6.94
	7-Oct-20	0.34	559	69	0.50	2020	1150	6.97
CCR-1 (Downgradient)	9-Dec-15	< 0.20	39	21	0.17	179	40	8.20
	11-Mar-16	< 0.20	35	36	0.11	217	40	8.38
	24-May-16	< 0.05	45	28	< 0.20	150	27	8.07
	23-Sep-16	0.07	40	23	< 0.20	200	16	8.05
	30-Nov-16	< 0.05	38	26	< 0.20	155	27	8.17
	28-Mar-17	< 0.05	46	37	< 0.20	240	32	8.28
	19-May-17	0.51	55	34	< 0.20	245	41	8.16
	21-Sep-17	0.55	75	92	< 0.20	375	83	8.19
	5-Oct-17	0.18	42	117	< 0.20	430	48	8.10
	25-May-18	0.32	69	229	< 0.20	730	104	8.37
	3-Oct-18	0.25	38	212	0.26	520	54	7.73
	18-Jan-19	0.15	64	154	0.31	470	110	8.33
	21-May-19	0.24	56	166	0.23	595	97	7.98
	27-Sep-19	0.24	45	121	0.42	375	67	7.41
	13-Mar-20	0.21	87	202	< 0.20	650	115	7.95
	29-Apr-20	0.27	77	192	< 0.20	625	112	7.50
	7-Oct-20	0.23	49	117	0.26	530	65	7.24
CCR-2 (Downgradient)	9-Dec-15	6.97	193	36	0.48	912	444	7.86
	11-Mar-16	6.66	191	34	0.42	974	471	7.74
	24-May-16	6.32	207	34	0.34	910	440	8.25
	23-Sep-16	6.98	152	32	0.45	815	326	8.00
	30-Nov-16	7.36	142	32	0.46	775	279	8.07
	28-Mar-17	7.05	220	29	0.31	835	343	7.93
	19-May-17	6.87	167	29	0.43	755	300	8.09
	21-Sep-17	7.92	174	28	0.47	645	237	8.22
	5-Oct-17	6.11	108	29	0.45	730	220	8.23
	25-May-18	5.08	105	25	0.35	590	164	8.05
	3-Oct-18	5.32	94	35	0.45	585	116	8.45
	18-Jan-19	5.50	117	44	0.46	505	112	8.23
	21-May-19	4.50	85	36	0.42	535	111	8.14
	30-Sep-19	4.85	89	35	0.61	615	104	7.99
	13-Mar-20	4.64	110	32	0.39	480	102	8.03
	29-Apr-20	4.50	102	31	0.34	480	103	7.90
	7-Oct-20	4.99	98	31	0.44	455	82	7.98

Notes:

1. Cells with "<" are represented as non-detects. Values shown correspond to the laboratory reporting limit.
2. Background values based on statistical evaluation of initial eight rounds (Dec. 2015 through Sept. 2017) of groundwater sampling data for Well CCR-3.

Table 2
Huntley Power LLC
Huntley South Settling Pond – Groundwater Analytical Data
CCR Appendix IV Constituents

Monitoring Well	Date Sampled	Total Antimony (mg/L)	Total Arsenic (mg/L)	Total Barium (mg/L)	Total Beryllium (mg/L)	Total Cadmium (mg/L)	Total Chromium (mg/L)	Total Cobalt (mg/L)	Total Fluoride (mg/L)	Total Lead (mg/L)	Total Lithium (mg/L)	Total Mercury (mg/L)	Total Molybdenum (mg/L)	Total Selenium (mg/L)	Total Thallium (mg/L)	Total Radium-226 and 228 (pCi/L)
		Calculated Background														
		0.01	0.016	0.13	0.004	0.005	0.005	0.05	0.24	0.011	0.05	0.0000053	0.01	0.005	0.065	4.48
		Groundwater Protection Standard														
		Background	Background	MCL	MCL	MCL	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background	MCL
		0.01	0.016	2	0.004	0.005	0.1	0.05	4.0	0.015	0.05	0.002	0.10	0.05	0.065	5
CCR-3 (Upgradient)	9-Dec-15	< 0.060	0.013	0.07	< 0.003	< 0.005	< 0.010	< 0.050	0.19	< 0.050	< 0.10	0.0000053	< 0.025	< 0.010	< 0.010	1.18
	11-Mar-16	< 0.060	0.016	0.05	< 0.003	< 0.005	< 0.010	< 0.050	0.21	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	1.31
	24-May-16	< 0.060	0.010	0.05	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	0.016	0.19
	23-Sep-16	< 0.060	0.006	0.05	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.34
	30-Nov-16	< 0.060	0.008	0.05	< 0.005	< 0.005	< 0.005	< 0.050	0.24	0.011	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.25
	28-Mar-17	< 0.060	< 0.005	0.07	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	0.065	1.49
	19-May-17	0.0079	< 0.005	0.08	< 0.004	< 0.005	< 0.005	< 0.050	0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.33
	21-Sep-17	0.0097	0.006	0.10	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.00
	29-Mar-18	< 0.0004	< 0.005	0.09	< 0.0003	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.00
	25-May-18	Not Analyzed	< 0.005	0.07	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	< 0.20	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.30
	3-Oct-18	Not Analyzed	< 0.005	0.06	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	< 0.20	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	1.13
	18-Jan-19	< 0.0004	< 0.005	0.07	< 0.004	< 0.003	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	0.0000021	< 0.010	< 0.005	< 0.0003	1.57
	21-May-19	Not Analyzed	< 0.005	0.05	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	< 0.20	Not Analyzed	Not Analyzed	0.0000024	Not Analyzed	Not Analyzed	Not Analyzed	1.07
	27-Sep-19	Not Analyzed	< 0.005	0.05	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	< 0.20	Not Analyzed	Not Analyzed	0.0000036	Not Analyzed	Not Analyzed	Not Analyzed	-0.09
	13-Mar-20	< 0.0004	< 0.005	0.06	< 0.005	< 0.001	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	0.0000026	< 0.010	< 0.005	< 0.0005	0.65
	29-Apr-20	< 0.0004	< 0.005	0.07	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	< 0.20	Not Analyzed	< 0.05	0.0000033	Not Analyzed	Not Analyzed	Not Analyzed	2.58
	7-Oct-20	< 0.0004	< 0.005	0.09	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	< 0.20	Not Analyzed	< 0.05	0.0000017	Not Analyzed	Not Analyzed	Not Analyzed	1.75
A-2 (Downgradient)	9-Dec-15	< 0.060	< 0.010	0.04	< 0.003	< 0.005	< 0.010	< 0.050	0.53	< 0.050	0.11	< 0.0000010	< 0.025	< 0.010	< 0.010	1.42
	11-Mar-16	< 0.060	< 0.010	0.06	< 0.003	< 0.005	< 0.010	< 0.050	0.41	< 0.050	0.12	< 0.0000010	< 0.025	< 0.010	< 0.010	1.83
	24-May-16	< 0.060	0.009	0.04	< 0.005	< 0.005	< 0.005	< 0.050	0.23	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.63
	23-Sep-16	< 0.060	< 0.005	0.04	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.91
	30-Nov-16	< 0.060	0.006	0.03	< 0.005	< 0.005	< 0.005	< 0.050	0.46	0.019	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	2.00
	28-Mar-17	< 0.060	< 0.005	0.04	< 0.005	< 0.005	0.010	< 0.050	< 0.20	0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	0.037	2.15
	19-May-17	0.0047	< 0.005	0.04	< 0.004	< 0.005	< 0.005	< 0.050	0.54	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.79
	21-Sep-17	0.0032	0.005	0.03	< 0.004	< 0.005	< 0.005	< 0.050	0.28	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.83
	29-Mar-18	< 0.0004	< 0.005	0.04	< 0.0003	< 0.005	< 0.005	< 0.050	0.24	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	1.00
	25-May-18	Not Analyzed	0.006	0.03	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.34	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	2.14
	3-Oct-18	Not Analyzed	< 0.005	0.03	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.38	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.97
	18-Jan-19	< 0.0004	< 0.005	0.03	< 0.004	< 0.003	< 0.005	< 0.050	0.41	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	1.76
	21-May-19	Not Analyzed	< 0.005	0.02	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.53	Not Analyzed	Not Analyzed	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	2.04
	30-Sep-19	Not Analyzed	< 0.005	0.03	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.32	Not Analyzed	Not Analyzed	0.0000008	Not Analyzed	Not Analyzed	Not Analyzed	0.19
	13-Mar-20	< 0.0004	0.006	0.04	< 0.005	< 0.001	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0005	1.19
	29-Apr-20	< 0.0004	< 0.005	0.03	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.34	Not Analyzed	< 0.05	0.0000007	Not Analyzed	Not Analyzed	Not Analyzed	2.11
	7-Oct-20	< 0.0004	< 0.005	0.03	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.50	Not Analyzed	< 0.05	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	2.56

See notes at end of table.

Table 2 (cont'd)
Huntley Power LLC
Huntley South Settling Pond – Groundwater Analytical Data
CCR Appendix IV Constituents

Monitoring Well	Date Sampled	Total Antimony (mg/L)	Total Arsenic (mg/L)	Total Barium (mg/L)	Total Beryllium (mg/L)	Total Cadmium (mg/L)	Total Chromium (mg/L)	Total Cobalt (mg/L)	Total Fluoride (mg/L)	Total Lead (mg/L)	Total Lithium (mg/L)	Total Mercury (mg/L)	Total Molybdenum (mg/L)	Total Selenium (mg/L)	Total Thallium (mg/L)	Total Radium-226 and 228 (pCi/L)
		Calculated Background														
		0.01	0.016	0.13	0.004	0.005	0.005	0.05	0.24	0.011	0.05	0.0000053	0.01	0.005	0.065	4.48
		Groundwater Protection Standard														
		Background	Background	MCL	MCL	MCL	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background	MCL
		0.01	0.016	2	0.004	0.005	0.1	0.05	4.0	0.015	0.05	0.002	0.10	0.05	0.065	5
CCR-1 (Downgradient)	9-Dec-15	< 0.060	< 0.010	0.06	< 0.003	< 0.005	< 0.010	< 0.050	0.17	< 0.050	< 0.10	0.0000012	< 0.025	< 0.010	< 0.010	0.00
	11-Mar-16	< 0.060	< 0.010	0.06	< 0.003	< 0.005	< 0.010	< 0.050	0.11	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	0.00
	24-May-16	< 0.060	< 0.005	0.06	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	0.024	0.194	0.00
	23-Sep-16	< 0.060	0.005	0.08	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.11
	30-Nov-16	< 0.060	< 0.005	0.06	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.23
	28-Mar-17	< 0.060	0.010	0.06	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	0.0000010	< 0.010	< 0.005	0.012	0.00
	19-May-17	0.0032	< 0.005	0.16	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	0.087	< 0.05	0.0000005	< 0.010	< 0.005	< 0.0007	0.29
	21-Sep-17	0.0028	0.010	0.21	< 0.004	< 0.005	0.008	< 0.050	< 0.20	0.080	< 0.05	0.0000005	< 0.010	< 0.005	< 0.0007	0.29
	29-Mar-18	< 0.0004	< 0.005	0.17	< 0.0003	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	1.30
	25-May-18	Not Analyzed	< 0.005	0.16	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	< 0.20	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.91
	3-Oct-18	Not Analyzed	< 0.005	0.10	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.26	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	1.58
	18-Jan-19	< 0.0004	< 0.005	0.12	< 0.004	< 0.003	< 0.005	< 0.050	0.31	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.89
	21-May-19	Not Analyzed	< 0.005	0.10	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.23	Not Analyzed	Not Analyzed	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	1.20
	27-Sep-19	Not Analyzed	< 0.005	0.10	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.42	Not Analyzed	Not Analyzed	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	1.27
	13-Mar-20	0.0007	0.007	0.16	< 0.005	< 0.001	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	0.0000010	< 0.010	< 0.005	< 0.0005	0.93
	29-Apr-20	< 0.0004	< 0.005	0.15	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	< 0.20	Not Analyzed	< 0.05	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	2.70
	7-Oct-20	< 0.0004	< 0.005	0.11	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.26	Not Analyzed	< 0.05	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	0.95
CCR-2 (Downgradient)	9-Dec-15	< 0.060	0.021	0.07	< 0.003	< 0.005	< 0.010	< 0.050	0.48	< 0.050	0.23	0.0000128	< 0.025	< 0.010	< 0.010	0.00
	11-Mar-16	< 0.060	0.025	0.07	< 0.003	< 0.005	< 0.010	< 0.050	0.42	< 0.050	0.23	0.0000020	< 0.025	< 0.010	< 0.010	1.11
	24-May-16	< 0.060	0.023	0.06	< 0.005	< 0.005	< 0.005	< 0.050	0.34	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.16
	23-Sep-16	< 0.060	0.029	0.06	< 0.005	< 0.005	< 0.005	< 0.050	0.45	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.41
	30-Nov-16	< 0.060	0.026	0.07	< 0.005	< 0.005	< 0.005	< 0.050	0.46	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.13
	28-Mar-17	< 0.060	0.033	0.07	< 0.005	< 0.005	< 0.005	< 0.050	0.31	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.00
	19-May-17	0.0031	0.036	0.12	< 0.004	< 0.005	0.006	< 0.050	0.43	0.016	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	1.02
	21-Sep-17	0.0026	0.061	0.14	< 0.004	< 0.005	0.016	< 0.050	0.47	0.019	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.29
	29-Mar-18	< 0.0004	0.017	0.07	< 0.0003	< 0.005	0.009	< 0.050	0.49	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.00
	25-May-18	Not Analyzed	< 0.005	0.05	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.35	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	1.74
	3-Oct-18	Not Analyzed	0.023	0.05	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.45	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	1.25
	18-Jan-19	< 0.0004	0.026	0.08	< 0.004	< 0.003	< 0.005	< 0.050	0.46	< 0.005	< 0.05	0.0000010	< 0.010	< 0.005	< 0.0003	0.42
	21-May-19	Not Analyzed	0.017	0.05	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.42	Not Analyzed	Not Analyzed	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	1.32
	30-Sep-19	Not Analyzed	0.021	0.06	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.61	Not Analyzed	Not Analyzed	0.0000006	Not Analyzed	Not Analyzed	Not Analyzed	0.67
	13-Mar-20	< 0.0004	0.030	0.07	< 0.005	< 0.001	< 0.005	< 0.050	0.39	< 0.005	0.19	0.0000013	< 0.010	< 0.005	< 0.0005	0.55
	29-Apr-20	< 0.0004	0.026	0.06	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.34	Not Analyzed	< 0.05	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	1.47
	7-Oct-20	< 0.0004	0.031	0.07	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.44	Not Analyzed	0.13	< 0.0000005	Not Analyzed	Not Analyzed	Not Analyzed	1.23

Notes:

1. Cells with "<" are represented as non-detects. Values shown correspond to the laboratory reporting limit.
2. Background values based on statistical evaluation of initial eight rounds (Dec. 2015 through Sept. 2017) of groundwater sampling data for Well CCR-3.
3. As indicated, Groundwater Protection Standards are either published MCLs or risk-based Regional Screening Levels (RSLs). For constituents where calculated background exceeds either the MCL or RSL, the background value is used.

Table 3
Huntley Power LLC
Huntley Landfill – Groundwater Analytical Data
CCR Appendix III Constituents

Monitoring Well	Date Sampled	Total Boron (mg/L)	Total Calcium (mg/L)	Total Chloride (mg/L)	Total Fluoride (mg/L)	Total Dissolved Solids (mg/L)	Sulfate (mg/L)	pH (S.U.)
		Calculated Background						
		0.84	470	6.1	0.73	1021	225	6.19-7.78
12D (Upgradient)	9-Dec-15	0.58	46	4	0.61	718	171	7.74
	25-Jan-16	0.61	470	4	0.63	713	141	7.66
	25-Apr-16	0.65	63	4	0.53	910	163	7.45
	26-Jul-16	0.64	59	3	0.44	785	140	7.78
	27-Oct-16	0.65	48	3	0.41	730	150	7.58
	31-Jan-17	0.74	58	4	0.54	725	148	7.51
	24-Apr-17	0.52	67	4	0.58	760	167	6.19
	24-Jul-17	0.69	70	5	0.50	800	186	7.47
	9-Oct-17	0.72	71	4	0.52	795	191	7.58
	30-May-18	0.62	54	5	0.62	730	187	6.76
	15-Oct-18	0.33	43	4	0.45	690	160	7.76
	28-Jan-19	0.67	79	4	0.60	762	166	7.73
	29-Apr-19	0.64	49	4	0.52	760	167	7.88
	11-Oct-19	0.61	51	4	0.54	590	137	7.67
	27-Jan-20	0.55	45	4	0.55	725	143	7.63
	27-Apr-20	0.65	44	3	0.57	685	140	7.39
	26-Oct-20	0.58	56	4	0.98	785	158	8.10
7D (Downgradient)	9-Dec-15	1.36	475	5	0.95	2550	1780	7.65
	25-Jan-16	1.45	528	6	0.92	2600	1810	7.92
	25-Apr-16	1.33	595	5	0.55	2660	1720	7.77
	26-Jul-16	1.26	556	5	0.47	2750	1660	7.70
	24-Oct-16	1.56	712	5	0.77	2710	2000	7.60
	30-Jan-17	1.58	586	5	0.38	2740	1790	7.08
	24-Apr-17	1.42	421	5	0.34	2740	1750	7.98
	24-Jul-17	1.47	582	5	0.65	2780	1760	7.61
	9-Oct-17	1.19	686	5	0.56	2780	1750	7.63
	30-May-18	1.36	618	5	0.87	2680	1900	7.83
	15-Oct-18	0.80	337	6	0.60	2490	1670	8.96
	28-Jan-19	1.49	450	5	0.84	2570	1790	7.73
	29-Apr-19	1.34	706	5	0.70	2820	1810	7.87
	15-Oct-19	1.38	490	5	0.79	2740	1690	7.80
	27-Jan-20	1.22	504	5	0.68	2800	1870	7.52
	27-Apr-20	1.45	541	5	0.60	2600	1850	7.54
	26-Oct-20	1.29	665	5	0.69	2700	2050	7.85
11D (Downgradient)	9-Dec-15	1.23	290	9	0.60	1740	1170	7.72
	26-Jan-16	1.25	372	11	0.66	1750	1310	7.38
	25-Apr-16	1.19	390	9	0.45	1740	963	7.54
	26-Jul-16	1.14	310	9	0.33	1740	968	7.68
	24-Oct-16	1.49	452	13	0.62	2460	1710	7.31
	31-Jan-17	1.68	437	13	0.28	2420	1540	7.67
	25-Apr-17	1.22	338	14	0.24	2540	1520	7.42
	24-Jul-17	1.51	520	13	0.57	2490	1530	7.38
	9-Oct-17	1.25	416	13	0.46	2420	1560	7.28
	30-May-18	1.44	453	12	0.71	2420	1630	7.12
	15-Oct-18	0.97	303	15	0.63	2380	1540	7.52
	28-Jan-19	1.61	420	15	0.69	2290	1480	7.30
	29-Apr-19	1.44	422	14	0.74	2400	1480	7.90
	14-Oct-19	1.46	352	15	0.66	2410	1440	7.38
	27-Jan-20	1.29	448	16	0.59	2450	1620	7.47
	27-Apr-20	1.58	442	15	0.46	2270	1560	7.22
	27-Oct-20	1.33	434	16	0.61	2320	1710	7.47

See notes at end of table.

Table 3 (cont'd)
Huntley Power LLC
Huntley Landfill – Groundwater Analytical Data
CCR Appendix III Constituents

Monitoring Well	Date Sampled	Total Boron (mg/L)	Total Calcium (mg/L)	Total Chloride (mg/L)	Total Fluoride (mg/L)	Total Dissolved Solids (mg/L)	Sulfate (mg/L)	pH (S.U.)
		Calculated Background						
		0.84	470	6.1	0.73	1021	225	6.19-7.78
13D (Downgradient)	9-Dec-15	1.86	495	35	0.74	2770	2060	7.56
	25-Jan-16	1.97	527	36	0.68	2720	1970	7.85
	25-Apr-16	1.89	657	36	0.41	2900	1880	7.55
	26-Jul-16	1.66	768	34	0.32	3000	1780	7.85
	25-Oct-16	2.10	480	36	0.29	3000	1840	7.87
	31-Jan-17	1.81	463	39	0.53	2940	2070	7.47
	25-Apr-17	1.60	349	43	0.63	2980	2130	7.40
	24-Jul-17	2.00	685	40	0.58	2950	1980	7.57
	9-Oct-17	1.83	576	37	0.42	2940	1920	7.46
	30-May-18	1.94	609	39	0.53	2910	2040	7.61
	15-Oct-18	1.01	296	44	0.55	2940	1930	7.76
	28-Jan-19	2.04	525	47	0.65	2820	1860	7.38
	29-Apr-19	1.81	573	47	0.49	3100	1990	7.89
	14-Oct-19	1.89	571	48	0.60	2800	1840	7.87
	27-Jan-20	1.67	531	53	0.51	2990	1990	7.57
	27-Apr-20	2.02	538	49	0.48	2960	1950	7.27
	27-Oct-20	1.70	407	55	0.50	2900	2160	7.56
14D (Downgradient)	9-Dec-15	1.08	388	34	0.55	2340	1670	7.73
	25-Jan-16	1.13	393	37	0.48	2220	1580	7.74
	25-Apr-16	1.04	349	33	0.29	2260	1450	7.58
	26-Jul-16	0.91	364	30	0.20	2250	1340	7.92
	24-Oct-16	1.15	597	38	0.42	2480	1770	7.51
	30-Jan-17	1.13	488	41	0.41	2500	1800	7.55
	24-Apr-17	1.13	444	35	< 0.20	2400	1480	7.88
	24-Jul-17	1.40	613	37	0.44	2410	1560	7.74
	9-Oct-17	0.98	395	38	0.30	2470	1550	7.47
	30-May-18	1.05	399	33	0.50	2320	1570	7.91
	15-Oct-18	0.55	227	47	0.45	2500	1550	6.68
	28-Jan-19	1.25	424	48	0.50	2360	1520	7.44
	29-Apr-19	1.11	614	48	0.36	2570	1600	7.77
	14-Oct-19	1.11	482	50	0.46	2570	1500	7.77
	27-Jan-20	1.04	407	53	0.39	2480	1620	7.91
	27-Apr-20	1.08	391	48	0.29	2380	1620	7.48
	27-Oct-20	1.45	496	56	0.46	2320	1700	7.48
CCR-4 (Downgradient)	9-Dec-15	1.60	548	37	0.77	2590	1970	7.48
	25-Jan-16	1.56	556	33	0.85	2700	1910	8.96
	25-Apr-16	1.59	707	31	0.41	3000	1800	6.05
	25-Jul-16	1.70	714	33	0.32	2960	1740	5.79
	25-Oct-16	1.60	553	35	0.32	2890	1610	7.47
	31-Jan-17	1.45	549	36	0.53	2890	2020	7.78
	25-Apr-17	1.28	413	35	0.21	2920	1780	7.29
	24-Jul-17	1.63	733	36	0.61	2870	1840	7.53
	9-Oct-17	1.69	725	34	0.43	2890	1820	7.31
	30-May-18	1.36	420	34	0.49	2870	1610	7.16
	15-Oct-18	< 0.05	342	39	0.53	2770	1850	7.79
	28-Jan-19	1.55	436	39	0.66	2770	1810	6.05
	29-Apr-19	1.50	464	39	0.56	2900	1810	7.62
	15-Oct-19	1.46	470	40	0.63	2940	1720	7.15
	5-Feb-20	1.69	583	44	0.64	2880	1850	7.40
	27-Apr-20	1.53	688	43	0.47	2760	1870	7.28
	27-Oct-20	1.32	703	47	< 0.20	2740	2010	6.29

See notes at end of table.

Table 3 (cont'd)
Huntley Power LLC
Huntley Landfill – Groundwater Analytical Data
CCR Appendix III Constituents

Monitoring Well	Date Sampled	Total Boron (mg/L)	Total Calcium (mg/L)	Total Chloride (mg/L)	Total Fluoride (mg/L)	Total Dissolved Solids (mg/L)	Sulfate (mg/L)	pH (S.U.)
		Calculated Background						
		0.84	470	6.1	0.73	1021	225	6.19-7.78
CCR-5 (Downgradient)	9-Dec-15	1.46	544	28	0.79	2590	1930	7.44
	25-Jan-16	1.39	537	27	0.79	2570	1860	7.72
	25-Apr-16	1.39	649	32	0.48	2690	1730	6.60
	25-Jul-16	1.55	847	28	0.36	2920	1740	6.27
	25-Oct-16	1.50	594	29	0.31	2880	1750	7.82
	31-Jan-17	1.25	603	31	0.57	2830	1970	7.62
	25-Apr-17	1.04	479	41	0.28	2860	1690	7.09
	24-Jul-17	1.43	592	34	0.65	2790	1820	7.09
	9-Oct-17	1.57	742	29	0.44	2850	1800	7.24
	30-May-18	1.14	429	34	0.52	2710	1540	7.25
	15-Oct-18	0.78	346	33	0.61	2820	1820	7.66
	28-Jan-19	1.40	487	39	0.72	2730	1750	7.15
	29-Apr-19	1.19	477	45	0.70	2810	1730	7.67
	15-Oct-19	1.27	593	34	0.64	2670	1650	7.33
	5-Feb-20	1.65	835	53	0.69	2800	1780	7.32
	27-Apr-20	1.31	689	52	0.48	2780	1810	7.29
	27-Oct-20	1.19	722	43	0.90	2740	1980	7.47
CCR-6 (Downgradient)	9-Dec-15	1.56	537	26	0.76	2740	1930	7.48
	25-Jan-16	1.50	539	26	0.76	2670	1880	7.46
	25-Apr-16	1.29	581	28	0.46	2830	1780	7.03
	25-Jul-16	1.57	770	27	0.32	2900	1780	7.46
	25-Oct-16	1.63	760	27	0.34	2900	1730	7.63
	31-Jan-17	1.12	464	30	0.46	2570	1860	8.61
	25-Apr-17	1.15	336	30	< 0.20	2860	1700	7.21
	24-Jul-17	1.56	693	31	0.66	2900	1820	7.16
	9-Oct-17	1.72	893	27	0.46	2880	1800	7.26
	30-May-18	1.34	493	30	0.55	2860	1630	7.33
	15-Oct-18	0.95	412	31	0.62	2820	1770	7.76
	28-Jan-19	1.50	512	35	0.74	2670	1780	7.24
	29-Apr-19	1.32	457	35	0.70	2890	1780	7.36
	15-Oct-19	1.41	515	33	0.68	2860	1720	7.41
	5-Feb-20	1.72	591	40	0.70	2780	1800	6.97
	27-Apr-20	1.38	564	40	0.51	2800	1860	7.30
	27-Oct-20	1.26	689	< 2	< 0.20	2730	2320	7.43

Notes:

1. Cells with "<" are represented as non-detects. Values shown correspond to the laboratory reporting limit.
2. Background values based on statistical evaluation of initial eight rounds (Dec. 2015 through July 2017) of groundwater sampling data for Well 12D.

Table 4
Huntley Power LLC
Huntley Landfill – Groundwater Analytical Data
CCR Appendix IV Constituents

Monitoring Well	Date Sampled	Total Antimony (mg/L)	Total Arsenic (mg/L)	Total Barium (mg/L)	Total Beryllium (mg/L)	Total Cadmium (mg/L)	Total Chromium (mg/L)	Total Cobalt (mg/L)	Total Fluoride (mg/L)	Total Lead (mg/L)	Total Lithium (mg/L)	Total Mercury (mg/L)	Total Molybdenum (mg/L)	Total Selenium (mg/L)	Total Thallium (mg/L)	Total Radium-226 and 228 (pCi/L)
		Calculated Background														
		0.01	0.006	0.07	0.004	0.005	0.005	0.05	0.73	0.006	0.05	0.0000036	0.025	0.005	0.019	2.98
		Groundwater Protection Standard														
		Background	MCL	MCL	MCL	MCL	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background	MCL
		0.01	0.01	2	0.004	0.005	0.1	0.05	4.0	0.015	0.05	0.002	0.10	0.05	0.019	5
12D (Upgradient)	9-Dec-15	< 0.010	< 0.010	0.06	< 0.003	< 0.005	< 0.010	< 0.050	0.61	< 0.050	< 0.10	0.0000015	< 0.025	< 0.010	< 0.010	1.01
	25-Jan-16	< 0.060	< 0.010	0.06	< 0.003	< 0.005	< 0.010	< 0.050	0.63	< 0.050	< 0.10	0.0000036	< 0.025	< 0.010	< 0.010	1.03
	25-Apr-16	< 0.060	< 0.005	0.07	< 0.005	< 0.005	< 0.005	< 0.050	0.53	< 0.005	< 0.05	0.0000006	0.011	< 0.005	< 0.010	0.00
	26-Jul-16	< 0.060	< 0.005	0.06	< 0.005	< 0.005	< 0.005	< 0.050	0.44	< 0.005	< 0.05	0.0000006	0.013	< 0.005	0.019	0.26
	27-Oct-16	< 0.060	< 0.005	0.06	< 0.005	< 0.005	< 0.005	< 0.050	0.41	< 0.005	< 0.05	0.0000020	0.011	< 0.005	0.013	0.19
	31-Jan-17	< 0.060	0.006	0.06	< 0.005	< 0.005	< 0.005	< 0.050	0.54	< 0.005	< 0.05	< 0.0000005	0.013	< 0.005	0.019	0.33
	24-Apr-17	0.0112	< 0.005	0.06	< 0.004	< 0.005	< 0.005	< 0.050	0.58	0.006	< 0.05	0.0000005	< 0.010	< 0.005	< 0.0007	0.33
	24-Jul-17	0.0053	< 0.005	0.07	< 0.004	< 0.005	< 0.005	< 0.050	0.50	< 0.005	< 0.05	< 0.0000005	0.013	< 0.005	< 0.0007	0.35
	2-Apr-18	0.0037	0.008	0.06	< 0.0003	< 0.005	< 0.005	< 0.050	0.62	0.011	< 0.05	< 0.0000005	0.012	< 0.005	< 0.0003	0.67
	30-May-18	< 0.0004	< 0.005	0.05	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.62	< 0.005	Not Analyzed	Not Analyzed	0.013	Not Analyzed	Not Analyzed	0.45
	15-Oct-18	0.0149	0.006	0.05	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.45	0.017	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	1.09
	28-Jan-19	0.0130	< 0.005	0.11	< 0.004	< 0.003	< 0.005	< 0.050	0.60	0.093	< 0.05	0.0000015	< 0.010	< 0.005	< 0.0003	0.58
	29-Apr-19	0.0057	< 0.005	0.06	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.52	0.007	Not Analyzed	0.0000083	0.011	Not Analyzed	Not Analyzed	0.72
	11-Oct-19	0.0068	< 0.005	0.06	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.54	0.027	Not Analyzed	0.0000036	< 0.010	Not Analyzed	Not Analyzed	1.51
	27-Jan-20	< 0.060	< 0.005	0.05	< 0.004	< 0.005	< 0.005	< 0.050	0.55	0.015	< 0.05	0.0000015	< 0.010	< 0.005	< 0.010	1.22
	27-Apr-20	0.0025	< 0.005	0.05	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.57	< 0.005	Not Analyzed	0.0000009	0.011	Not Analyzed	Not Analyzed	-0.13
	26-Oct-20	0.0134	< 0.005	0.06	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.98	0.023	Not Analyzed	0.0000008	< 0.010	Not Analyzed	Not Analyzed	2.09
7D (Downgradient)	9-Dec-15	< 0.010	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.95	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	1.24
	25-Jan-16	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.92	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	0.25
	25-Apr-16	< 0.060	< 0.005	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.55	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.28
	26-Jul-16	< 0.060	0.006	0.03	< 0.005	< 0.005	< 0.005	< 0.050	0.47	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.12
	24-Oct-16	< 0.060	0.010	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.77	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.46
	30-Jan-17	< 0.060	0.005	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.38	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.53
	24-Apr-17	< 0.060	< 0.005	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.34	< 0.005	< 0.05	< 0.0000005	< 0.010	0.010	< 0.010	0.48
	24-Jul-17	0.008	< 0.005	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.65	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.34
	2-Apr-18	< 0.0004	< 0.005	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.45	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.00
	30-May-18	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.87	0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	1.62
	15-Oct-18	0.0070	< 0.005	0.02	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.60	0.007	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	1.47
	28-Jan-19	0.0039	< 0.005	< 0.01	< 0.004	< 0.003	< 0.005	< 0.050	0.84	0.007	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.81
	29-Apr-19	0.0033	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.70	0.006	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	0.85
	15-Oct-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.79	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	0.48
	27-Jan-20	< 0.060	< 0.005	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.68	0.008	< 0.05	0.0000024	0.011	< 0.005	< 0.010	0.91
	27-Apr-20	0.0012	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.60	< 0.005	Not Analyzed	0.0000006	< 0.010	Not Analyzed	Not Analyzed	1.01
	26-Oct-20	0.0086	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.69	< 0.005	Not Analyzed	< 0.0000005	0.053	Not Analyzed	Not Analyzed	0.89

See notes at end of table.

Table 4 (cont'd)
Huntley Power LLC
Huntley Landfill – Groundwater Analytical Data
CCR Appendix IV Constituents

Monitoring Well	Date Sampled	Total Antimony (mg/L)	Total Arsenic (mg/L)	Total Barium (mg/L)	Total Beryllium (mg/L)	Total Cadmium (mg/L)	Total Chromium (mg/L)	Total Cobalt (mg/L)	Total Fluoride (mg/L)	Total Lead (mg/L)	Total Lithium (mg/L)	Total Mercury (mg/L)	Total Molybdenum (mg/L)	Total Selenium (mg/L)	Total Thallium (mg/L)	Total Radium-226 and 228 (pCi/L)
		Calculated Background														
		0.01	0.006	0.07	0.004	0.005	0.005	0.05	0.73	0.006	0.05	0.0000036	0.025	0.005	0.019	2.98
		Groundwater Protection Standard														
		Background	MCL	MCL	MCL	MCL	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background	MCL
		0.01	0.01	2	0.004	0.005	0.1	0.05	4.0	0.015	0.05	0.002	0.10	0.05	0.019	5
11D (Downgradient)	9-Dec-15	< 0.010	< 0.010	0.06	< 0.003	< 0.005	< 0.010	< 0.050	0.60	< 0.050	< 0.10	0.0000021	< 0.025	< 0.010	< 0.010	0.29
	26-Jan-16	< 0.060	0.016	0.14	< 0.003	< 0.005	0.014	< 0.050	0.66	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	1.24
	25-Apr-16	< 0.060	0.015	0.02	< 0.005	< 0.005	< 0.005	< 0.050	0.45	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.00
	26-Jul-16	< 0.060	0.024	0.02	< 0.005	< 0.005	< 0.005	< 0.050	0.33	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	0.012	0.26
	24-Oct-16	< 0.060	0.015	0.03	< 0.005	< 0.005	0.012	< 0.050	0.62	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.13
	31-Jan-17	< 0.060	0.008	0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.28	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.00
	25-Apr-17	0.0040	< 0.005	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.24	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	1.30
	24-Jul-17	0.0068	< 0.005	0.02	< 0.004	< 0.005	< 0.005	< 0.050	0.57	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.24
	2-Apr-18	0.0006	0.010	0.02	< 0.0003	< 0.005	< 0.005	< 0.050	0.37	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	1.47
	30-May-18	< 0.0004	< 0.005	0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.71	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	1.03
	15-Oct-18	< 0.0004	< 0.005	0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.63	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	0.96
	28-Jan-19	< 0.0004	< 0.005	0.02	< 0.004	< 0.003	< 0.005	< 0.050	0.69	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.99
	29-Apr-19	< 0.0040	< 0.005	0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.74	0.006	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.21
	14-Oct-19	< 0.0004	< 0.005	0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.66	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.01
	27-Jan-20	< 0.060	< 0.005	0.01	< 0.004	< 0.005	< 0.005	< 0.05	0.59	0.006	< 0.05	0.0000013	< 0.010	< 0.005	< 0.010	0.60
	27-Apr-20	< 0.0004	< 0.005	0.02	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.46	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	0.86
	27-Oct-20	0.0085	< 0.005	0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.61	< 0.005	Not Analyzed	< 0.0000005	0.016	Not Analyzed	Not Analyzed	1.30
13D (Downgradient)	9-Dec-15	< 0.010	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.74	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	0.56
	25-Jan-16	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.68	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	0.45
	25-Apr-16	< 0.060	< 0.005	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.41	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.61
	26-Jul-16	< 0.060	0.007	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.32	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.51
	25-Oct-16	< 0.060	0.011	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.29	< 0.005	< 0.05	< 0.0000005	0.010	< 0.005	< 0.010	0.79
	31-Jan-17	< 0.060	0.007	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.53	< 0.005	< 0.05	< 0.0000005	0.010	< 0.005	< 0.010	0.70
	25-Apr-17	0.0042	< 0.005	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.63	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	2.13
	24-Jul-17	0.0045	< 0.005	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.58	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.72
	2-Apr-18	< 0.0004	0.008	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.35	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.87
	30-May-18	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.53	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	1.77
	15-Oct-18	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.55	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	1.47
	28-Jan-19	< 0.0004	< 0.005	< 0.01	< 0.004	< 0.003	< 0.005	< 0.050	0.65	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	1.00
	29-Apr-19	0.0005	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.49	0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.00
	14-Oct-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.60	< 0.005	Not Analyzed	0.0000008	< 0.010	Not Analyzed	Not Analyzed	1.19
	27-Jan-20	< 0.060	< 0.005	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.51	0.006	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.30
	27-Apr-20	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.48	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.23
	27-Oct-20	0.0079	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.50	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	12.8

See notes at end of table.

Table 4 (cont'd)
Huntley Power LLC
Huntley Landfill – Groundwater Analytical Data
CCR Appendix IV Constituents

Monitoring Well	Date Sampled	Total Antimony (mg/L)	Total Arsenic (mg/L)	Total Barium (mg/L)	Total Beryllium (mg/L)	Total Cadmium (mg/L)	Total Chromium (mg/L)	Total Cobalt (mg/L)	Total Fluoride (mg/L)	Total Lead (mg/L)	Total Lithium (mg/L)	Total Mercury (mg/L)	Total Molybdenum (mg/L)	Total Selenium (mg/L)	Total Thallium (mg/L)	Total Radium-226 and 228 (pCi/L)
		Calculated Background														
		0.01	0.006	0.07	0.004	0.005	0.005	0.05	0.73	0.006	0.05	0.0000036	0.025	0.005	0.019	2.98
		Groundwater Protection Standard														
		Background	MCL	MCL	MCL	MCL	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background	MCL
		0.01	0.01	2	0.004	0.005	0.1	0.05	4.0	0.015	0.05	0.002	0.10	0.05	0.019	5
14D (Downgradient)	9-Dec-15	< 0.010	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.55	< 0.050	< 0.10	0.0000010	< 0.025	< 0.010	< 0.010	0.36
	25-Jan-16	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.48	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	1.14
	25-Apr-16	< 0.060	0.009	0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.29	< 0.005	< 0.05	< 0.0000005	0.011	< 0.005	< 0.010	0.00
	26-Jul-16	< 0.060	0.010	0.02	< 0.005	< 0.005	< 0.005	< 0.050	0.20	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.54
	24-Oct-16	< 0.060	0.023	0.01	< 0.005	< 0.005	0.015	< 0.050	0.42	< 0.005	< 0.05	< 0.0000005	0.010	< 0.005	< 0.010	0.56
	30-Jan-17	< 0.060	0.023	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.41	< 0.005	< 0.05	< 0.0000005	0.012	< 0.005	< 0.010	0.44
	24-Apr-17	< 0.060	0.008	0.01	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	< 0.0000005	0.011	0.006	< 0.010	1.98
	24-Jul-17	0.0075	0.012	0.02	< 0.004	< 0.005	< 0.005	< 0.050	0.44	< 0.005	< 0.05	< 0.0000005	0.014	< 0.005	< 0.0007	0.61
	2-Apr-18	0.0019	0.020	0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.25	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.00
	30-May-18	< 0.0004	0.006	0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.50	< 0.005	Not Analyzed	Not Analyzed	0.011	Not Analyzed	Not Analyzed	1.02
	15-Oct-18	< 0.0004	0.008	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.45	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	1.23
	28-Jan-19	< 0.0004	0.009	< 0.01	< 0.004	< 0.003	< 0.005	< 0.050	0.50	< 0.005	< 0.05	< 0.0000005	0.013	< 0.005	< 0.0003	2.09
	29-Apr-19	< 0.0004	0.009	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.36	< 0.005	Not Analyzed	< 0.0000005	0.010	Not Analyzed	Not Analyzed	2.07
	14-Oct-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.46	< 0.005	Not Analyzed	0.0000008	< 0.010	Not Analyzed	Not Analyzed	0.92
	27-Jan-20	< 0.060	0.008	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.39	0.006	< 0.05	0.0000014	0.012	< 0.005	< 0.010	1.12
	27-Apr-20	< 0.0004	0.009	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.29	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.23
	27-Oct-20	0.0071	0.006	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.46	< 0.005	Not Analyzed	< 0.0000005	0.054	Not Analyzed	Not Analyzed	2.89
CCR-4 (Downgradient)	9-Dec-15	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.77	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	1.43
	25-Jan-16	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.85	< 0.050	< 0.10	0.0000019	< 0.025	< 0.010	< 0.010	1.39
	25-Apr-16	< 0.060	0.011	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.41	< 0.005	< 0.05	< 0.0000005	0.010	< 0.005	< 0.010	0.52
	25-Jul-16	< 0.060	0.009	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.32	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.58
	25-Oct-16	< 0.060	0.006	< 0.01	< 0.005	< 0.005	0.005	< 0.050	0.32	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.51
	31-Jan-17	< 0.060	0.018	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.53	< 0.005	< 0.05	< 0.0000005	0.010	< 0.005	< 0.010	0.67
	25-Apr-17	0.0034	0.006	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.21	0.006	< 0.05	< 0.0000005	0.011	0.008	< 0.0007	1.99
	24-Jul-17	0.0066	< 0.005	0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.61	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.67
	2-Apr-18	< 0.0004	0.012	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.35	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	2.66
	30-May-18	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.49	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	2.01
	15-Oct-18	< 0.0004	0.007	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.53	0.006	Not Analyzed	Not Analyzed	0.013	Not Analyzed	Not Analyzed	2.06
	28-Jan-19	< 0.0004	< 0.005	< 0.01	< 0.004	< 0.003	< 0.005	< 0.050	0.66	< 0.005	< 0.05	< 0.0000005	0.011	< 0.005	< 0.0003	1.56
	29-Apr-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.56	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.84
	15-Oct-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.63	< 0.005	Not Analyzed	0.0000044	< 0.010	Not Analyzed	Not Analyzed	1.93
	5-Feb-20	< 0.0004	0.008	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.64	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.64
	27-Apr-20	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.47	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	0.40
	27-Oct-20	< 0.0004	< 0.005	0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	< 0.20	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.29

See notes at end of table.

Table 4 (cont'd)
Huntley Power LLC
Huntley Landfill – Groundwater Analytical Data
CCR Appendix IV Constituents

Monitoring Well	Date Sampled	Total Antimony (mg/L)	Total Arsenic (mg/L)	Total Barium (mg/L)	Total Beryllium (mg/L)	Total Cadmium (mg/L)	Total Chromium (mg/L)	Total Cobalt (mg/L)	Total Fluoride (mg/L)	Total Lead (mg/L)	Total Lithium (mg/L)	Total Mercury (mg/L)	Total Molybdenum (mg/L)	Total Selenium (mg/L)	Total Thallium (mg/L)	Total Radium-226 and 228 (pCi/L)
		Calculated Background														
		0.01	0.006	0.07	0.004	0.005	0.005	0.05	0.73	0.006	0.05	0.0000036	0.025	0.005	0.019	2.98
		Groundwater Protection Standard														
		Background	MCL	MCL	MCL	MCL	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background	MCL
		0.01	0.01	2	0.004	0.005	0.1	0.05	4.0	0.015	0.05	0.002	0.10	0.05	0.019	5
CCR-5 (Downgradient)	9-Dec-15	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.79	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	1.89
	25-Jan-16	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.79	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	1.35
	25-Apr-16	< 0.060	0.008	0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.48	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.47
	25-Jul-16	< 0.060	< 0.005	0.02	< 0.005	< 0.005	< 0.005	< 0.050	0.36	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.85
	25-Oct-16	< 0.060	0.009	0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.31	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.54
	31-Jan-17	< 0.060	0.022	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.57	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	2.02
	25-Apr-17	0.004	< 0.005	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.28	0.006	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.69
	24-Jul-17	0.009	0.005	0.02	< 0.004	< 0.005	< 0.005	< 0.050	0.65	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	1.74
	2-Apr-18	< 0.0004	0.013	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.36	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	1.11
	30-May-18	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.52	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	2.00
	15-Oct-18	< 0.0004	0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.61	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	2.12
	28-Jan-19	< 0.0004	< 0.005	< 0.01	< 0.004	< 0.003	< 0.005	< 0.050	0.72	0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	2.00
	29-Apr-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.70	0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.80
	15-Oct-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.64	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.61
	5-Feb-20	< 0.0004	0.006	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.69	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.13
	27-Apr-20	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.48	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.46
	27-Oct-20	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.90	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.74
CCR-6 (Downgradient)	9-Dec-15	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.76	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	1.20
	25-Jan-16	< 0.060	< 0.010	< 0.02	< 0.003	< 0.005	< 0.010	< 0.050	0.76	< 0.050	< 0.10	< 0.0000010	< 0.025	< 0.010	< 0.010	0.25
	25-Apr-16	< 0.060	0.008	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.46	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.32
	25-Jul-16	< 0.060	0.007	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.32	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	1.48
	25-Oct-16	< 0.060	0.010	< 0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.34	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.39
	31-Jan-17	< 0.060	0.024	0.01	< 0.005	< 0.005	< 0.005	< 0.050	0.46	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.36
	25-Apr-17	0.0046	0.007	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	0.008	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	1.26
	24-Jul-17	0.0089	0.006	0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.66	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0007	1.38
	2-Apr-18	0.0005	0.010	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.38	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.00
	30-May-18	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.55	< 0.005	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	0.60
	15-Oct-18	< 0.0004	0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.62	0.006	Not Analyzed	Not Analyzed	< 0.010	Not Analyzed	Not Analyzed	2.04
	28-Jan-19	< 0.0004	< 0.005	< 0.01	< 0.004	< 0.003	< 0.005	< 0.050	0.74	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.0003	2.27
	29-Apr-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.70	0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.41
	15-Oct-19	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.68	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.80
	5-Feb-20	< 0.0004	0.010	< 0.01	< 0.004	< 0.005	< 0.005	< 0.050	0.70	< 0.005	< 0.05	< 0.0000005	< 0.010	< 0.005	< 0.010	0.84
	27-Apr-20	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.51	< 0.005	Not Analyzed	0.0000006	< 0.010	Not Analyzed	Not Analyzed	1.34
	27-Oct-20	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	< 0.20	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.12

= Result from August 2, 2018 resampling; prior results from May 30, 2018 sampling showed confounding data from the sample (5.02 pCi/L) and the sample field duplicate (2.28 pCi/L). August 2018 resampling result deemed representative and consistent with historical values for this well.

Notes:

1. Cells with "<" are represented as non-detects. Values shown correspond to the laboratory reporting limit.
2. Background values based on statistical evaluation of initial eight rounds (Dec. 2015 through July 2017) of groundwater sampling data for Well 12D.
3. As indicated, Groundwater Protection Standards are either published MCLs or risk-based Regional Screening Levels (RSLs). For constituents where calculated background exceeds either the MCL or RSL, the background value is used.
4. 4th QTR 2015 values for Antimony, Arsenic, Chromium, Molybdenum, and Selenium in Well 14D based on October 2015 sampling event.

Figures

OFFICE	DATE	DESIGNED BY	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
Pittsburgh, PA	1/7/21	--	E. Schlegel	D. Shott	--	631229737-B9

LEGEND:

A-2 (565.60) — CCR GROUNDWATER MONITORING WELL WITH GROUNDWATER ELEVATION MEASURED ON OCTOBER 7, 2020

GROUNDWATER GENERALIZED FLOW DIRECTION

REFERENCE:

GOOGLE AERIAL PHOTOGRAPH, DATED 10/2016.

SCALE

0 150 300 FEET

APTIM
500 Penn Center Boulevard,
Suite 900
Pittsburgh, Pennsylvania 15235

HUNTLEY POWER LLC

FIGURE 1
CCR COMPLIANCE GROUNDWATER MONITORING WELL LOCATION MAP SOUTH SETTLING POND
HUNTLEY GENERATING STATION
TONAWANDA, NEW YORK

File: O:\PROJECT\NRG-HUNTLY\631229737-B9.dwg
Plot Date/Time: Jan 07, 2021 - 1:30pm
Plotted By: Evan.Schlegel
Xref: Image: photo 3.jpg

LEGEND:

MW-12D (574.25) — CCR GROUNDWATER MONITORING WELL WITH GROUNDWATER ELEVATION MEASURED BETWEEN OCTOBER 26-27, 2020

GROUNDWATER GENERALIZED FLOW DIRECTION

REFERENCE:

GOOGLE AERIAL PHOTOGRAPH, DATED 10/2016.

SCALE

0 150 300 FEET

APTIM

500 Penn Center Boulevard,
Suite 900
Pittsburgh, Pennsylvania 15235

HUNTLEY POWER LLC

FIGURE 2
CCR COMPLIANCE GROUNDWATER MONITORING WELL LOCATION MAP
HUNTLEY LANDFILL
HUNTLEY GENERATING STATION
TONAWANDA, NEW YORK

DRAWING NUMBER	APPROVED BY	CHECKED BY	DRAWN BY	DESIGNED BY	DATE
631229737-B10	--	D. Shott	E.Schlegel	--	1/7/21

OFFICE: Pittsburgh, PA

File: O:\PROJECT\NRG-HUNTLY\631229737-B10.dwg
Plot Date/Time: Jan 07, 2021 - 10:12am
Plotted By: Evan.Schlegel
Xref: Image: photo 2.jpg

Appendix A

South Settling Pond—Progress Reports for Arsenic Remedy Selection

Semiannual Progress Report – Selection of Remedy
Huntley Generating Station—Huntley Power LLC
South Settling Pond
Tonawanda, New York

Following completion of the Assessment of Corrective Measures Report (ACM Report) on August 31, 2019 and per the requirements of 40 CFR §257.97(a), this document represents the first semiannual progress report (for the period ending January 31, 2020) with regard to the ongoing CCR remedy selection process for the South Settling Pond at the Huntley Generating Station. As outlined in the ACM Report, a portion of the Huntley Station property (referred to as the South Parcel) was enrolled in the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) in February 2019. The limits of the South Parcel encompass the South Settling Pond, and thus the CCR remedy selection efforts have become significantly dependent on the outcomes from the forthcoming BCP field investigation and corresponding remedy evaluation activities.

With respect to the BCP, the NYSDEC-Region 9 recently issued a Fact Sheet (attached) in December 2019 to provide an overview of the South Parcel (NYSDEC Site No. C915337), and to advertise a public comment period on the draft Remedial Investigation Work Plan (RIWP) that will guide the BCP field investigation activities. At present, it is anticipated that RIWP approval will be received in early-2020, followed by the start of intrusive field work and sampling during Spring 2020.

Concurrent with the above and as required, Huntley Power LLC will continue to conduct Assessment Monitoring activities for the South Settling Pond. The next semiannual progress report will provide an update for the period covering February 1, 2020 through August 31, 2020.

FACT SHEET

Brownfield Cleanup Program

Huntley Power South Parcel
3500 River Road
Tonawanda, NY 14150

SITE No. C915337
NYSDEC REGION 9

December 2019

Draft Investigation Work Plan for Brownfield Site Available for Public Comment

The public is invited to comment on a draft work plan being reviewed by the New York State Department of Environmental Conservation (NYSDEC) to investigate the Huntley Power South Parcel site ("site") located at 3500 River Road, Tonawanda, Erie County. Please see the map for the site location.

Draft Investigation Work Plan: The draft investigation work plan, called a "Remedial Investigation Work Plan," (RIWP) was submitted to NYSDEC under New York's Brownfield Cleanup Program. The investigation will be performed by Huntley Power LLC ("applicant(s)") with oversight by NYSDEC and the New York State Department of Health (NYSDOH).

How to Comment: NYSDEC is accepting written comments about the Draft RIWP for 30 days, from **December 18, 2019 through January 18, 2020**.

- Access the RIWP and other project documents online through the DECinfo Locator: https://www.dec.ny.gov/data/DecDocs/C915337/.
- Documents also are available at the location(s) identified at left under "Where to Find Information."
- Please submit comments to the NYSDEC project manager listed under Project-Related Questions in the "Who to Contact" area at left.

Highlights of the Proposed Site Investigation: The investigation will define the nature and extent of contamination in soil, surface water, groundwater and any other parts of the environment that may be affected.

Previous investigations have detected arsenic in surface and subsurface soil at the site. Petroleum contamination has also been documented in the former coal pile area within the on-site containment wall.

Key components of the investigation work include:

- Geophysical surveys to locate subsurface utilities and features;
- Installing and sampling soil borings and test pits to identify possible on-site sources of contamination;
- Collecting surface water and sediment samples from the on-site south settling pond; and
- Installing and sampling groundwater wells to monitor impacts from areas of concern both on-site and off-site.

Next Steps: NYSDEC will consider public comments, revise the plan as necessary, and approve the work plan. NYSDOH must concur with the plan. After the work plan is approved, the activities detailed in the work plan will be implemented.

Where to Find Information

Access project documents through the DECinfo Locator and at these location(s):

Buffalo & Erie County Public Library - Riverside Branch
820 Tonawanda Street
Buffalo, NY 14207
(716) 875-0562

Who to Contact

Comments and questions are welcome and should be directed as follows:

Project-Related Questions
Benjamin McPherson, Project Manager
NYSDEC
270 Michigan Avenue
Buffalo, NY 14203
(716) 851-7220
benjamin.mcpherson@dec.ny.gov

Project-Related Health Questions
Steven Berninger
NYSDOH
Empire State Plaza
Corning Tower, Room 1787
Albany, NY 12237
(518) 402-7860
beei@health.ny.gov

For more information about New York's Brownfield Cleanup Program, visit:
www.dec.ny.gov/chemical/8450.html

BROWNFIELD CLEANUP PROGRAM

When the investigation is completed, a report will be prepared and submitted to NYSDEC that summarizes the results. NYSDEC will review the report, make any necessary revisions and, if appropriate, approve the report.

After the investigation, a proposed cleanup plan, called a "Draft Remedial Work Plan" will be developed. The cleanup plan will include an evaluation of the proposed site remedy, or recommend a no action or no further action alternative. The goal of the cleanup plan is to ensure the protection of public health and the environment. NYSDEC will present the proposed cleanup plan to the public for its review and comment during a 45-day comment period.

NYSDEC will keep the public informed throughout the investigation and cleanup of the site.

Site Description: The site is part of the former Huntley Power Plant property that operated as a coal-fired electric generating plant from 1916 to 2016, when operations ceased. The site is 34.80-acres and is bordered to the north by the remainder of the former power plant property, to the east by River Road, to the south by Erie County Water Authority property, and to the west by the Niagara River. The site is currently inactive and contains a former coal pile storage area and waste water treatment infrastructure relating to former power plant operations.

Additional site details, including environmental and health assessment summaries, are available on NYSDEC's Environmental Site Remediation Database (by entering the site ID, C915337) at:
http://www.dec.ny.gov/cfmx/extapps/derexternal/index.cfm?pageid=3

Brownfield Cleanup Program: New York's Brownfield Cleanup Program (BCP) encourages the voluntary cleanup of contaminated properties known as "brownfields" so that they can be reused and redeveloped. These uses may include recreation, housing, business or other uses. A brownfield site is any real property where a contaminant is present at levels exceeding the soil cleanup objectives or other health-based or environmental standards, criteria or guidance adopted by DEC that are applicable based on the reasonably anticipated use of the property, in accordance with applicable regulations.

For more information about the BCP, visit:
http://www.dec.ny.gov/chemical/8450.html

We encourage you to share this fact sheet with neighbors and tenants, and/or post this fact sheet in a prominent area of your building for others to see.

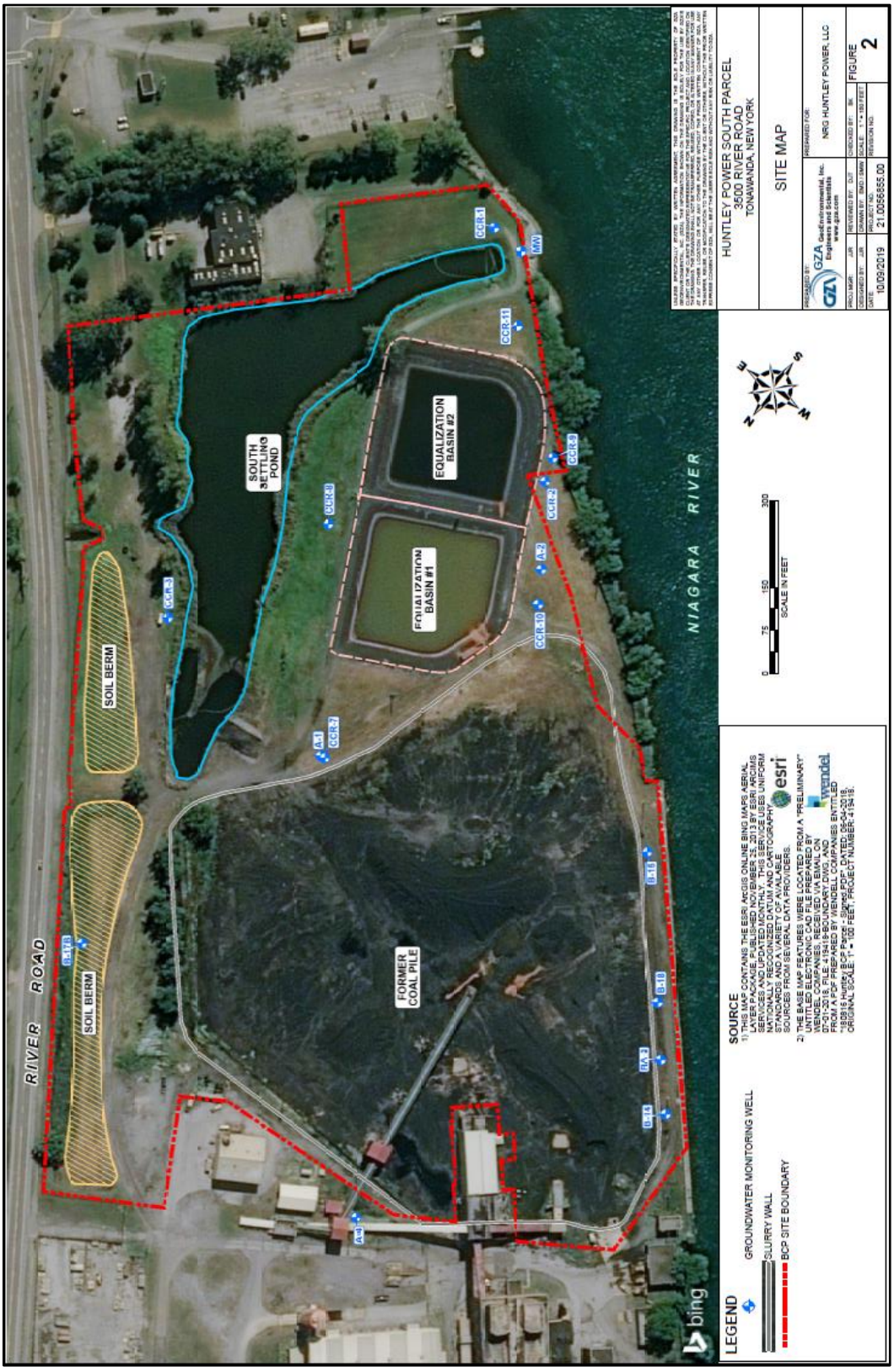
Stay Informed With DEC Delivers
Sign up to receive site updates by email:
www.dec.ny.gov/chemical/61092.html

Note: Please disregard if you already have signed up and received this fact sheet electronically.

DECinfo Locator
Interactive map to access DEC documents and public data about the environmental quality of specific sites: http://www.dec.ny.gov/pubs/109457.html

BROWNFIELD CLEANUP PROGRAM

Site Location Map



Second Semiannual Progress Report – Selection of Remedy
Huntley Generating Station—Huntley Power LLC
South Settling Pond
Tonawanda, New York

Following completion of the Assessment of Corrective Measures Report (ACM Report) on August 31, 2019 and per the requirements of 40 CFR §257.97(a), this document represents the second semiannual progress report (for the period ending July 31, 2020) with regard to the ongoing CCR remedy selection process for the South Settling Pond at the Huntley Generating Station. As outlined in the ACM Report, a portion of the Huntley Station property (referred to as the South Parcel) was enrolled in the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) in February 2019. The limits of the South Parcel encompass the South Settling Pond, and thus the CCR remedy selection efforts have become significantly dependent on the outcomes from the forthcoming BCP field investigation and corresponding remedy evaluation activities.

With respect to the BCP, the NYSDEC-Region 9 issued a Fact Sheet (previously attached to the first semiannual progress report) to provide an overview of the South Parcel (NYSDEC Site No. C915337), and to advertise a public comment period on the Remedial Investigation Work Plan (RIWP) that will guide the BCP field investigation activities. Comments on the RIWP have since been received from the NYSDEC-Region 9, and subsequently addressed by Huntley Power LLC. A revised RIWP was resubmitted and is currently pending final approval by NYSDEC-Region 9. Following receipt of approval, it is anticipated that field work and sampling to support the BCP Investigation will begin during Fall 2020.

It is further acknowledged that the August 2019 ACM (conducted for arsenic) will be revisited and supplemented to incorporate additional information as may be developed to address the recently identified Statistically Significant Level (SSL) of lithium at the South Settling Pond. Notification of this SSL was provided to NYSDEC in early-July 2020.

Concurrent with the above and as required, Huntley Power LLC will continue to conduct Assessment Monitoring activities for the South Settling Pond. The next semiannual progress report will provide an update for the period covering August 1, 2020 through January 31, 2021.

Appendix B

South Settling Pond--Notifications for Lithium SSL and ACM Initiation

NRG Huntley Power, LLC
3500 River Road
Tonawanda, NY 14150

July 2020

Mr. David Vitale
New York State Department of Environmental Conservation
Division of Materials Management Director
625 Broadway
Albany, NY 12233-7250

RE: CCR Rule Notice

Dear Mr. Vitale:

Pursuant to the EPA's CCR Rule and sections 40 CFR Parts §257.105 - §257.107, Huntley Power LLC is notifying the New York State Department of Environmental Conservation per the Recordkeeping, Notification and Internet Requirements regarding the following operations for the Huntley Power LLC Generating Station.

In accordance with the requirements of Title 40 CFR §257.95, the station commenced and established an Assessment Monitoring Program in 2018 for the CCR impoundment and the CCR landfill. Based on the results, the facility has determined one or more SSL's (the second one) above the corresponding groundwater protection standard has occurred around the CCR impoundment. Notice of this determination is required to be entered into the facility operating record per §257.105(h)(8), noticed to the State Director per §257.106(h)(6) and posted to the publicly accessible website per §257.107(h)(6).

Additionally, this determination carries obligations to characterize the nature and extent of the SSL impacts per §257.95(g)(1)(i-iv),and to conduct an Assessment of Corrective Measures per §257.95(g)(3)(i) and §257.96(a) which will be initiated as required.

Information as required has or will be provided to public website http://www.nrg.com/legal/coal-combustion-residuals/ within the timelines determined by the rule.

Should you require additional information, please contact George Streit at (716) 200-2797 or George.Streit@NRG.com.

Sincerely,

George T. Streit
Environmental Coordinator

cc: Peter Grasso, P.E., 270 Michigan Ave., Buffalo, NY 14203

Huntley Power LLC
3500 River Road
Tonawanda, NY 14150

October 9, 2020

Mr. David Vitale
New York State Department of Environmental Conservation
Division of Materials Management Director
625 Broadway
Albany, NY 12233-7250

RE: CCR Rule Notice
Huntley Power LLC

Dear Mr. Vitale:

Pursuant to the EPA's CCR Rule (40 CFR Part 257) and in accordance with the specific provisions of §257.95(g)(5) and the associated requirements of §257.106(h)(7), Huntley Power LLC is providing notification to the New York State Department of Environmental Conservation (NYSDEC) that an Assessment of Corrective Measures (ACM) is being initiated for the Huntley South Settling Pond (SPDES Permit NY0001023) at the Huntley Generating Station. This activity is in response to the previous notification (provided to the NYSDEC on July 9, 2020) that an Appendix IV constituent (Lithium) had been detected at a Statistically Significant Level (SSL) above an established Groundwater Protection Standard (GWPS) in a downgradient monitoring well at the referenced CCR unit. This current notification regarding the ACM has also been entered into the facility's operating record, and will additionally be posted on our CCR website per the requirements of §257.107(h)(7). The ACM will be conducted in accordance with the requirements of §257.96, including potential application of the 60-Day extension provision per §257.96(a), as needed.

Should you require additional information, please contact George Streit at (716)-200-2797 or George.Streit@nrg.com.

Respectfully submitted,

George T. Streit
Environmental Coordinator

cc: Peter Grasso, P.E., 270 Michigan Ave., Buffalo, NY 14203

CCR ASSESSMENT OF CORRECTIVE MEASURES
Huntley Generating Station
November 4, 2020

George Streit
Huntley Power LLC
3500 River Road
Tonawanda, NY 14150

VIA E-MAIL

Re: CCR Assessment of Corrective Measures Time Extension Request
Huntley Generating Station—South Settling Pond
Tonawanda, New York

Dear Mr. Streit,

As you are aware, Title 40 Code of Federal Regulations (CFR) Part 257 Subpart D addresses the management of coal combustion residuals (CCR) in landfills and surface impoundments. As an acknowledged feature formerly used for the management of CCR materials, the South Settling Pond at the Huntley Generating Station is subject to the provisions of the CCR Rule. Per notification provided to the State Director on July 9, 2020, lithium was measured in a downgradient CCR monitoring well (Well CCR-2) at a statistically significant level (SSL) above its corresponding site-specific groundwater protection standard. This determination, in turn, has triggered an Assessment of Corrective Measures (ACM) which commenced on October 9, 2020, per §257.95(g)(3)(i) and §257.96(a). As required, Huntley Power LLC provided notice of the ACM initiation to the State Director in accordance with §257.106(h)(7).

In parallel with the ACM, Huntley Power LLC is conducting a comprehensive Remedial Investigation in support of efforts associated with participation in the New York State's Brownfield Cleanup Program (BCP). Under the BCP, Huntley Power LLC will be characterizing the area designated as the South Parcel, which also encompasses the physical boundaries of the South Settling Pond. As such, BCP investigation-derived data generated/compiled throughout the remainder of 2020 will be useful and complimentary to the ACM activities for the South Settling Pond. In order to make effective use of the BCP data and information, a 60-day extension of the ACM due date is being applied in accordance with provisions under §257.96(a) of the CCR Rule. Accordingly, the ACM will be completed by March 9, 2021.

Respectfully submitted,

David Shott, CHMM
APTIM

Richard Southorn, P.E., P.G.
APTIM

cc: David Bacher, NRG
Tony Shea, NRG

CERTIFICATION

In accordance with Section 257.96(a) of the CCR Rule, I hereby certify based on a review of the information contained within this time extension request dated November 4, 2020 that the information contained is accurate to the best of my knowledge.

Certified by:

Richard Southorn, P.E., P.G.
New York Professional Engineer Registration No.: 97551
APTIM

Signature: _____

Date: November 4, 2020

Seal: