

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

Prepared for:

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January 2024

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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 2023) 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). 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).

In 2020, lithium was confirmed in downgradient Well CCR-2 at an SSL above the corresponding CCR GWPS. An ACM was initiated in October 2020 and completed in March 2021, making use of the 60-day extension provision contained in §257.96(a). As documented in the respective ACMs and in the continuing semiannual progress reports (January 2023 and July 2023; included in Appendix A of this current report), remedy selection has not yet taken place and is interdependent 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, and collectively addresses the identified arsenic and lithium groundwater impacts. At present, it is anticipated that remedy selection for the South Settling Pond will likely be addressed in 2024.

For Calendar Year 2023, the South Settling Pond entered and ended the period in the Assessment Monitoring Program. Relative to the current reporting period, sampling events were conducted in May and October 2023. The combined events continue to show arsenic and lithium concentrations above their respective GWPSs in downgradient Well CCR-2 (see Table 2). Concentrations of lead in Well CCR-2 remained below the Regional Screening Level (RSL) that serves as the GWPS. As depicted in Table 1, the 2023 monitoring events showed several Appendix III constituents at values above background in the downgradient wells, including Well A-2 (calcium, fluoride, and sulfate), Well CCR-1 (fluoride), Well CCR-2 (boron, fluoride, and pH), and Well CCR-3 (fluoride).

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 – calcium, fluoride, and sulfate
 - Well CCR-1 – fluoride
 - Well CCR-2 – boron, fluoride, and pH
 - Well CCR-3 - fluoride

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) – Arsenic and lithium continue to be measured at SSLs in downgradient Well CCR-2 as reported during the May and October 2023 monitoring events. ACMs for arsenic and lithium were completed in August 2019 and March 2021, respectively.
- §257.90(e)(6)(v) – Remedy selection under §257.97 associated with the previously completed ACMs for arsenic and lithium is pending the outcome of ongoing activities being conducted under the NYSDEC BCP. At present, it is anticipated that remedy selection will be addressed in 2024.
- §257.90(e)(6)(vi) – Remedy implementation for arsenic and lithium 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 2023, 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). Relative to the current reporting period, sampling events conducted in April and October 2023 showed similar lithium concentrations in Wells CCR-4, CCR-5, and CCR-6 (located within the interior of the landfill). When compared against the furthestmost downgradient boundary Wells MW-7D and MW-11D (see Figure 2), which have remained generally at or below the lithium GWPS, the findings do not suggest that lithium concentrations in Wells CCR-4, CCR-5, and CCR-6 represent an SSL. For the current reporting period, no other Appendix IV constituents were measured at concentrations representing an SSL above the corresponding GWPSs (see Table 4). The 2023 sampling events continued to show several Appendix III constituents at values above background in the downgradient wells, including boron, TDS, and sulfate (all wells); calcium (CCR-4, CCR-5, and CCR-6); chloride (all wells except Well MW-7D); fluoride (Wells MW-7D, MW-11D, and MW-13D only); and pH (Wells MW-7D, MW-11D, MW-13D and MW-14D only). No groundwater-related findings to date have established an SSL or 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, sulfate, and TDS
 - Well CCR-6 – boron, calcium, chloride, sulfate, and TDS
 - Well MW-7D – boron, fluoride, sulfate, and TDS
 - Well MW-11D – boron, chloride, fluoride, pH, sulfate, and TDS
 - Well MW-13D – boron, chloride, pH, sulfate, and TDS
 - Well MW-14D – boron, 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.
- §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 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 continued management/disposal of CCR materials resulting from sustained operations and maintenance 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 seventh 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 2023. 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 six Annual Report (covering the 2022 Calendar Year reporting period) was completed on January 31, 2023, 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, 2023.

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 2023 reporting period.

2.2 2023 Data Collection

Following completion of the Assessment of Corrective Measures (ACM) for arsenic in August 2019 and the ACM for lithium in March 2021, and until such time when remedy selection has been completed, the South Settling Pond will remain in Assessment Monitoring. Accordingly, for the 2023 reporting period samples were collected and analyzed for Appendix III and Appendix IV constituents as required, during the May and October monitoring events. Results from the 2023 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). Lithium also remained above the GWPS in this well during both of the 2023 events. Following a transient increase (April 2021 monitoring event) in the reported lead concentration in Well CCR-2, the levels have returned to more typical levels for the past five consecutive sampling events.

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 2024.

2.3 2023 Monitoring Program Transitions

During 2023, there were no transitions between monitoring programs, with the South Settling Pond remaining in the CCR Assessment Monitoring Program.

2.4 2023 Corrective Actions

Since completion of the respective ACMs for arsenic (August 2019) and lithium (March 2021), required semiannual progress reporting [per §257.96(a)] has been performed, with copies of the two most recent reports (January and July 2023) included in Appendix A. These reports include continuing discussion of the inter-dependency of CCR remedy selection with other activities

ongoing to support work under the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP).

2.5 2024 Projected Activities

Moving into 2024, the South Settling Pond will continue in the Assessment Monitoring Program. Semiannual progress reporting [per §257.97(a)] will continue relative to remedy selection for arsenic and lithium. As acknowledged above, the CCR remedy selection process is invariably linked and significantly dependent upon the activities and outcomes of the BCP work and associated remedial solutions developed for that program. Utilizing the findings from the now complete BCP Remedial Investigation, the NYSDEC was provided with an “Alternatives Analysis Report and Remedial Action Work Plan” in June 2022 that outlined a strategy for remediation of the South Settling Pond and associated groundwater. Pending NYDEC’s approval of this BCP document, it is anticipated that actual remedy selection for the South Settling Pond will be addressed in mid-2024, with subsequent remedy implementation beginning later in the year.

Consideration remains for possible replacement of existing downgradient CCR Monitoring Well A-2, as the structural integrity of this well has been declining, with issues noted regarding the well casing. With remedy selection likely in 2024, it appears most likely that rehabilitation/replacement of the well will coincide with actual remedy implementation.

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 2023 reporting period.

3.2 2023 Data Collection

Following its transition in early-2018, the Huntley Landfill continued in the CCR Assessment Monitoring Program during the 2023 reporting period. Accordingly, samples were collected and analyzed for Appendix III and Appendix IV constituents as required, during the April and October 2023 monitoring events. Results from the 2023 sampling events are summarized in Tables 3 and 4, covering Appendix III and Appendix IV constituents, respectively. Relative to the current reporting period and per Table 4, sampling events conducted in April and October 2023 showed slightly elevated lithium concentrations in Wells CCR-4 and CCR-5 (located within the interior of the landfill) for the first time since CCR Assessment Monitoring began. When compared against the furthestmost downgradient boundary Wells MW-7D and MW-11D (see Figure 2), which have remained generally at or below the lithium GWPS, the findings do not suggest that lithium in Wells CCR-4 and CCR-5 represents an SSL. No other Appendix IV constituents were measured at concentrations representing an SSL above the corresponding GWPSs. 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 2024.

3.3 2023 Monitoring Program Transitions

During 2023, there were no transitions between monitoring programs, with the Huntley Landfill remaining in the CCR Assessment Monitoring Program.

3.4 2023 Corrective Actions

During 2023, there were no corrective actions undertaken.

3.5 2023 Projected Activities

Assessment Monitoring activities will continue for the Huntley Landfill during 2023, with continued review of Appendix III/Appendix IV constituent concentrations and comparison against calculated background and established groundwater protection standards.

Also, during 2024 consideration will be given to potential rehabilitation/replacement of upgradient Well MW-12D, as concerns have steadily increased regarding the structural integrity of this well. Additionally, consideration may be given for the potential installation of a new downgradient boundary well in the proximate area between existing Wells MW-7D and MW-11D. Preliminary indication of these possible modifications to the groundwater monitoring network were communicated to the NYSDEC via email dated September 30, 2022.

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
	14-Apr-21	1.45	463	221	< 0.20	2710	886	6.94
	14-Oct-21	1.25	458	181	0.24	2500	697	6.96
	27-May-22	1.36	356	210	< 0.20	2660	1100	6.92
28-Oct-22	1.47	209	186	0.23	2320	666	...*	
26-May-23	1.09	365	203	< 0.20	2640	908	7.10	
11-Oct-23	1.57	630	189	0.25	2510	722	6.65	
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
	14-Apr-21	0.33	570	69	0.50	2090	1210	7.45
	14-Oct-21	0.23	349	48	0.53	1400	794	7.54
	27-May-22	0.22	329	61	0.52	1760	1160	6.63
28-Oct-22	0.28	291	73	0.52	1890	1030	7.28	
26-May-23	0.19	278	81	0.43	1680	958	7.3	
11-Oct-23	0.34	918	115	0.63	2180	1250	6.9	

See notes at end of table.

Table 1 (cont.)
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-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
	14-Apr-21	0.19	68	147	0.27	530	94	8.47
	14-Oct-21	0.35	42	93	0.34	370	40	7.88
	27-May-22	0.53	42	123	0.31	580	139	7.90
28-Oct-22	0.62	71	111	0.35	550	141	7.42	
26-May-23	0.38	46	60	0.26	500	122	6.56	
11-Oct-23	0.59	57	60	0.43	380	82	6.63	
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
	14-Apr-21	3.84	102	31	0.46	595	58	8.08
	14-Oct-21	3.61	72	25	0.48	350	50	8.25
	27-May-22	4.39	55	43	0.54	480	33	8.14
28-Oct-22	5.85	97	40	0.52	435	34	7.83	
26-May-23	3.28	59	37	0.44	460	78	8.02	
11-Oct-23	5.19	120	39	0.57	460	45	7.90	

*---Insufficient recharge, inadequate volume for measurement.

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
	14-Apr-21	0.0025	< 0.005	0.07	< 0.000	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.05	0.0000046	< 0.010	< 0.005	< 0.0003	0.78
	14-Oct-21	< 0.0004	0.011	0.06	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.24	0.010	0.02	0.0000026	< 0.010	Not Analyzed	Not Analyzed	1.24
	27-May-22	< 0.0004	< 0.005	0.06	< 10.500	< 0.005	< 0.005	< 0.050	< 0.20	0.007	< 0.01	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.40
28-Oct-22	0.0029	< 0.005	0.08	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.23	0.010	< 0.01	0.0000121	Not Analyzed	< 0.005	Not Analyzed	0.94	
26-May-23	0.0010	0.013	0.07	< 0.005	< 0.001	< 0.005	< 0.050	< 0.20	0.004	< 0.01	0.0000119	< 0.010	0.003	< 0.0005	0.40	
11-Oct-23	< 0.0004	0.008	0.08	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.25	0.004	0.01	0.0000032	Not Analyzed	< 0.010	Not Analyzed	3.71	
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
	14-Apr-21	< 0.0004	< 0.005	0.04	< 0.0003	< 0.005	< 0.005	< 0.050	0.50	< 0.005	< 0.05	0.0000010	< 0.010	< 0.005	< 0.0003	0.42
	14-Oct-21	< 0.0004	0.007	0.04	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.53	< 0.005	0.04	0.0000015	< 0.010	Not Analyzed	Not Analyzed	1.50
	27-May-22	< 0.0004	< 0.005	0.04	< 0.0003	< 0.005	< 0.005	< 0.050	0.52	< 0.005	0.04	< 0.0000005	< 0.010	0.006	< 0.0006	0.95
28-Oct-22	< 0.0004	< 0.005	0.04	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.52	< 0.005	0.05	0.0000006	Not Analyzed	< 0.005	Not Analyzed	0.63	
26-May-23	0.0009	0.013	0.05	< 0.001	< 0.001	< 0.005	< 0.050	0.43	< 0.001	0.04	0.0000023	< 0.010	0.002	< 0.0005	2.40	
11-Oct-23	< 0.0004	< 0.001	0.04	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.63	< 0.001	0.05	0.0000006	Not Analyzed	< 0.001	Not Analyzed	2.60	

See notes at end of table.

**Table 2 (cont.)
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	0.000053	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	0.000012	< 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	0.000010	< 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	0.000010	< 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	0.000010	< 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
	14-Apr-21	0.0024	0.010	0.18	< 0.0003	< 0.005	< 0.005	< 0.050	0.27	< 0.005	< 0.05	0.0000057	< 0.010	< 0.005	< 0.0003	0.38
	14-Oct-21	< 0.0004	0.006	0.10	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.34	< 0.005	0.01	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.04
	27-May-22	0.0004	0.006	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.31	0.005	< 0.01	< 0.0000005	< 0.010	< 0.005	< 0.0003	0.10
28-Oct-22	< 0.0004	< 0.005	0.20	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.35	< 0.005	0.01	0.0000159	Not Analyzed	< 0.005	Not Analyzed	0.55	
26-May-23	0.0008	0.012	0.22	< 0.001	< 0.001	< 0.005	< 0.005	0.26	0.005	< 0.00	0.0000013	< 0.010	< 0.001	< 0.0005	0.49	
11-Oct-23	< 0.0004	0.002	0.13	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.43	< 0.001	0.01	0.0000019	Not Analyzed	< 0.001	Not Analyzed	4.48	
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
	14-Apr-21	0.0005	0.077	0.13	< 0.0003	< 0.005	< 0.005	< 0.050	0.46	0.016	< 0.05	0.0000122	0.015	< 0.005	< 0.0003	0.78
	14-Oct-21	< 0.0004	0.022	0.06	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.48	0.010	0.12	0.0000085	< 0.010	Not Analyzed	Not Analyzed	1.37
	27-May-22	0.0005	0.059	0.07	< 0.0003	< 0.005	0.006	< 0.050	0.54	0.011	0.14	0.0000005	< 0.010	< 0.005	< 0.0003	0.53
28-Oct-22	0.0007	0.073	0.11	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.52	< 0.005	0.14	0.0000159	Not Analyzed	< 0.005	Not Analyzed	0.15	
26-May-23	< 0.0004	0.074	0.15	< 0.001	< 0.001	0.007	< 0.050	0.44	0.013	0.13	0.0000016	< 0.010	< 0.001	< 0.0005	0.72	
11-Oct-23	< 0.0004	0.020	0.08	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.57	< 0.001	0.15	0.0000022	Not Analyzed	< 0.001	Not Analyzed	2.29	

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
	26-Apr-21	0.60	58	5	0.67	780	183	7.79
	25-Oct-21	0.62	44	5	0.71	760	177	7.47
	26-Apr-22	0.49	23	4	0.64	750	134	7.43
24-Oct-22	0.73	58	4	0.50	710	160	7.98	
21-Apr-23	0.58	40	4	0.63	710	134	7.40	
27-Oct-23	0.55	40	4	0.71	675	152	6.80	
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
	26-Apr-21	1.28	613	5	0.68	2680	1800	7.39
	26-Oct-21	1.10	470	5	0.78	2700	2040	7.26
	5-May-22	1.14	487	5	0.82	2720	1850	6.62
24-Oct-22	1.57	701	5	0.61	2580	1740	7.88	
21-Apr-23	1.32	401	5	0.55	2640	1630	7.43	
27-Oct-23	1.38	401	5	0.92	2520	1570	7.96	

See notes at end of table.

Table 3 (cont.)
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
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
	26-Apr-21	1.36	580	17	0.58	2400	1550	7.39
	26-Oct-21	1.41	396	17	0.74	2390	1700	6.33
	26-Apr-22	1.19	446	17	0.72	2450	1480	7.43
24-Oct-22	1.69	517	17	0.71	2430	1600	7.67	
24-Apr-23	1.37	319	15	0.64	2530	1530	7.13	
31-Oct-23	1.39	266	16	0.89	2410	1490	7.83	
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
	26-Apr-21	1.74	755	56	0.48	3030	1950	7.72
	25-Oct-21	1.70	522	55	0.66	2920	1930	7.81
	26-Apr-22	1.44	523	58	0.64	2870	1800	7.68
24-Oct-22	1.88	319	59	0.49	2940	1910	7.98	
25-Apr-23	1.89	273	57	0.59	2890	1810	6.81	
31-Oct-23	1.72	450	62	0.80	2850	1760	8.35	

See notes at end of table.

Table 3 (cont.)
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
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
	26-Apr-21	1.13	418	57	0.41	2460	1550	7.60
	25-Oct-21	1.03	380	52	0.74	2420	1540	8.18
	26-Apr-22	0.89	150	48	0.56	2320	1430	7.24
24-Oct-22	0.99	309	56	0.43	2340	1510	7.95	
25-Apr-23	1.11	301	52	0.55	2890	1810	6.81	
31-Oct-23	0.98	307	58	0.68	2260	1370	8.4	
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	7.4
	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
	26-Apr-21	1.62	716	48	0.82	2890	1920	6.52
	25-Oct-21	1.33	593	45	0.68	2920	1790	6.84
	25-Apr-22	1.21	166	49	0.59	2850	2030	7.57
24-Oct-22	1.46	627	47	1.07	2880	1810	6.51	
24-Apr-23	1.25	476	52	0.68	2330	1870	6.96	
30-Oct-23	1.52	402	50	0.64	2280	1750	7.53	

See notes at end of table.

Table 3 (cont.)
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
	26-Apr-21	1.51	789	43	0.72	2850	1900	7.30
	25-Oct-21	1.34	647	38	0.70	2710	1820	7.19
	26-Apr-22	1.04	457	54	0.72	2820	1900	6.31
24-Oct-22	1.52	601	33	0.44	2850	1800	7.22	
24-Apr-23	1.20	371	47	0.65	2800	1840	7.26	
30-Oct-23	1.47	502	38	0.66	2900	1740	7.2	
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
	26-Apr-21	1.64	667	40	0.81	2840	1890	7.24
	25-Oct-21	1.41	619	37	0.77	2790	1810	7.10
	26-Apr-22	1.11	447	52	0.61	2770	2000	7.07
24-Oct-22	1.68	637	31	0.57	2830	1770	7.49	
24-Apr-23	1.19	481	41	0.72	2900	1880	7.10	
30-Oct-23	1.42	380	34	0.69	2790	1740	7.53	

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	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	
	26-Apr-21	0.0019	< 0.005	0.07	< 0.0003	< 0.005	0.007	< 0.050	0.67	0.009	< 0.05	0.0000014	0.015	< 0.005	< 0.000	0.76	
	25-Oct-21	0.0046	< 0.005	0.05	Not Analyzed	Not Analyzed	0.007	Not Analyzed	0.71	0.014	Not Analyzed	0.0000006	0.016	Not Analyzed	Not Analyzed	1.07	
	26-Apr-22	0.0032	< 0.005	0.05	< 0.0003	< 0.005	< 0.005	< 0.050	0.64	0.008	0.04	< 0.0000005	0.018	< 0.005	< 0.0003	0.78	
24-Oct-22	0.0030	< 0.005	0.08	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.50	0.032	0.05	0.0000013	0.013	Not Analyzed	Not Analyzed	2.02		
21-Apr-23	0.0014	< 0.005	0.04	< 0.0003	< 0.005	< 0.005	< 0.050	0.63	< 0.005	0.04	0.0000015	0.014	< 0.005	< 0.0003	0.53		
27-Oct-23	0.0033	< 0.001	0.09	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.71	0.017	0.04	0.0000088	0.011	Not Analyzed	Not Analyzed	2.29		
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	
	26-Apr-21	0.0025	< 0.005	0.01	< 0.0003	< 0.005	0.007	< 0.050	0.68	< 0.005	< 0.05	0.0000010	< 0.010	< 0.005	< 0.0003	0.65	
	26-Oct-21	0.0020	< 0.005	< 0.01	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.78	< 0.005	Not Analyzed	< 0.0000005	0.011	Not Analyzed	Not Analyzed	0.86	
	5-May-22	0.0014	< 0.005	< 0.01	< 0.0005	< 0.005	< 0.005	< 0.050	0.82	< 0.005	0.05	0.0000006	< 0.010	< 0.005	< 0.0005	0.99	
24-Oct-22	0.0014	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.61	< 0.005	0.05	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	0.72		
21-Apr-23	0.0037	< 0.005	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.55	0.011	0.02	0.0000013	< 0.010	< 0.005	< 0.0003	1.05		
27-Oct-23	0.0015	< 0.001	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.92	0.008	0.04	< 0.0000001	< 0.010	Not Analyzed	Not Analyzed	1.67		

See notes at end of table.

Table 4 (cont.)
 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	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background
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
	26-Apr-21	< 0.0004	0.008	0.03	< 0.0003	< 0.005	0.012	< 0.050	0.58	< 0.005	< 0.05	0.0000007	< 0.010	< 0.005	< 0.000	0.88
	26-Oct-21	< 0.0004	< 0.005	0.01	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.74	0.007	Not Analyzed	< 0.0000005	0.016	Not Analyzed	Not Analyzed	1.71
	26-Apr-22	0.0009	< 0.005	0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.72	0.007	0.05	< 0.0000005	0.030	< 0.005	< 0.0003	0.87
24-Oct-22	0.0007	< 0.005	0.02	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.71	< 0.005	0.06/0.05	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.00	
24-Apr-23	< 0.0004	< 0.005	0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.64	< 0.005	0.04	< 0.0000005	< 0.010	< 0.005	< 0.0003	1.15	
31-Oct-23	< 0.0004	0.002	0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.89	0.005	0.05	< 0.0000007	< 0.010	Not Analyzed	Not Analyzed	2.25	
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	0.94
	26-Apr-21	< 0.0004	0.005	0.01	< 0.0003	< 0.005	0.007	< 0.050	0.48	< 0.005	< 0.05	0.0000007	0.011	< 0.005	< 0.0003	0.87
	25-Oct-21	0.0006	< 0.005	< 0.01	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.66	0.005	Not Analyzed	< 0.0000005	0.010	Not Analyzed	Not Analyzed	1.90
	26-Apr-22	0.0009	< 0.005	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.64	0.006	0.05	< 0.0000005	0.013	< 0.005	< 0.0003	1.69
24-Oct-22	0.0006	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.49	< 0.005	0.06	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.33	
25-Apr-23	< 0.0004	< 0.005	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.59	< 0.005	0.05	< 0.0000005	0.010	< 0.005	< 0.0003	1.45	
31-Oct-23	< 0.0004	< 0.001	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.80	< 0.005	0.06	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.63	

See notes at end of table.

Table 4 (cont.)
 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	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background
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
	26-Apr-21	< 0.0004	0.006	0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.41	< 0.005	< 0.05	0.0000008	< 0.010	< 0.005	< 0.000	1.43
	25-Oct-21	< 0.0004	0.007	< 0.01	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.74	0.005	Not Analyzed	< 0.0000005	0.011	Not Analyzed	Not Analyzed	1.62
	26-Apr-22	0.0007	0.008	0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.56	0.006	0.04	< 0.0000005	0.015	< 0.005	< 0.0003	0.57
24-Oct-22	0.0005	0.006	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.43	< 0.005	0.05	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.18	
25-Apr-23	0.0005	0.007	0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.55	0.006	0.03	< 0.0000005	0.012	< 0.005	< 0.0003	3.02	
31-Oct-23	< 0.0004	0.007	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.68	< 0.005	0.05	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.31	
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
	26-Apr-21	< 0.0004	< 0.005	0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.82	< 0.005	< 0.05	0.0000008	< 0.010	< 0.005	< 0.000	0.94
	25-Oct-21	< 0.0004	< 0.005	0.03	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.68	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	0.64
	25-Apr-22	0.0008	< 0.005	< 0.01	< 0.0005	< 0.005	< 0.005	< 0.050	0.59	0.007	0.06/0.06/0.06	< 0.0000005	0.025	< 0.005	< 0.0005	1.05
24-Oct-22	< 0.0004	0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	1.07	< 0.005	0.06	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.63	
24-Apr-23	< 0.0004	< 0.005	< 0.01	< 0.0005	< 0.005	< 0.005	< 0.050	0.68	< 0.005	0.05	< 0.0000005	< 0.010	< 0.005	< 0.0005	1.98	
30-Oct-23	< 0.0004	0.001	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.64	0.006	0.06	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.38	

See notes at end of table.

Table 4 (cont.)
 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	MCL	Background	MCL	RSL	Background	MCL	RSL	MCL	Background
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
	26-Apr-21	< 0.0004	< 0.005	0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.72	< 0.005	< 0.05	0.0000007	< 0.010	< 0.005	< 0.000	0.50
	25-Oct-21	< 0.0004	< 0.005	0.01	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.70	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.00
	26-Apr-22	0.0007	< 0.005	< 0.01	< 0.0005	< 0.005	< 0.005	< 0.050	0.72	0.007	0.06/0.06/0.06	< 0.0000005	0.013	< 0.005	< 0.0005	1.84
24-Oct-22	0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.44	< 0.005	0.06	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.10	
24-Apr-23	< 0.0004	< 0.005	0.01	< 0.0005	< 0.005	< 0.005	< 0.050	0.65	0.005	0.05	< 0.0000005	< 0.010	< 0.005	< 0.0005	2.23	
30-Oct-23	0.0004	0.001	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.66	0.006	0.06	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	2.38	
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
	26-Apr-21	< 0.0004	< 0.005	< 0.01	< 0.0003	< 0.005	< 0.005	< 0.050	0.81	< 0.005	< 0.05	0.0000007	< 0.010	< 0.005	< 0.000	1.51
	25-Oct-21	< 0.0004	< 0.005	< 0.01	Not Analyzed	Not Analyzed	< 0.005	Not Analyzed	0.77	< 0.005	Not Analyzed	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.70
	26-Apr-22	0.0007	< 0.005	< 0.01	< 0.0005	< 0.005	< 0.005	< 0.050	0.61	0.006	0.05	< 0.0000005	0.011	< 0.005	< 0.0005	1.91
24-Oct-22	0.0005	< 0.005	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.57	< 0.005	0.05	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	1.15	
24-Apr-23	< 0.0004	< 0.005	< 0.01	< 0.0005	< 0.005	< 0.005	< 0.050	0.72	< 0.005	0.05	< 0.0000005	0.011	< 0.005	< 0.0005	2.36	
30-Oct-23	< 0.0004	0.002	< 0.01	Not Analyzed	Not Analyzed	Not Analyzed	Not Analyzed	0.69	0.007	0.06	< 0.0000005	< 0.010	Not Analyzed	Not Analyzed	3.06	

See notes at end of table.

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

- Notes:
- = 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.
 - = Result from January 7, 2021 resampling; prior result from October 27, 2020 sampling showed an erroneous value (12.8 pCi/L). January 2021 resampling result deemed representative and consistent with historical values for this well.
 - = Results from December 10, 2021 resampling; prior results from October 25, 2021 sampling considered atypical for Well CCR-5 (0.011 mg/L) and Well CCR-6 (0.013 mg/L). December 2021 resampling results deemed representative and consistent with historical values for each of these wells.
 - = Results from April 26, 2022 sampling , and June 29, 2022 and July 26, 2022 resamplings. Although in agreement, the values are inconsistent with the non-detect history in each of these wells. Additionally, lithium levels at the downgradient boundary (Wells 7D, 11D, and 13D) remain at or below SSL thresholds.
 - = Samples from the April 26, 2022 event were lost by the laboratory. Values presented are associated with July 25-26, 2022 resampling.



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

File: O:\PROJECT\NRG-HUNTLEY\631229737-B15.dwg, Xref: AERIAL_2022.jpg
 Plot Date/Time: Jan 29, 2024 - 1:17pm Image: fig 1 photo.jpg
 Plotted By: Evan.Schlegel
 OFFICE Pittsburgh, PA
 DATE 1/29/24
 DESIGNED BY --
 DRAWN BY E. Schlegel
 CHECKED BY S. Z. Forney
 APPROVED BY --
 DRAWING NUMBER 63122937-B15



LEGEND:

- 
 A-2
 (561.98)
- 
 GROUNDWATER
 GENERALIZED FLOW
 DIRECTION

REFERENCE:
 GOOGLE AERIAL PHOTOGRAPH, DATED 5/8/2022.



	500 Penn Center Boulevard, Suite 1000 Pittsburgh, Pennsylvania 15235
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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-HUNTLEY\631229737-B16.dwg Xref: aeral-r_2022.jpg
 Plot Date/Time: Jan 29, 2024 - 1:17pm Image: fig 2 photo.jpg
 Plotted By: Evan.Schlegel

OFFICE Pittsburgh, PA
 DATE 1/29/24
 DESIGNED BY
 DRAWN BY E.Schlegel
 CHECKED BY S. Z.-Forney
 APPROVED BY
 DRAWING NUMBER 631229737-B16



LEGEND:

- MW-12D (573.48) CCR GROUNDWATER MONITORING WELL WITH GROUNDWATER ELEVATION MEASURED ON OCTOBER 30, 2023
- GROUNDWATER GENERALIZED FLOW DIRECTION

REFERENCE:
 GOOGLE AERIAL PHOTOGRAPH, DATED 5/28/2022.



APTIM 500 Penn Center Boulevard, Suite 1000
 Pittsburgh, Pennsylvania 15235

HUNTLEY POWER LLC

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

Appendix A

*South Settling Pond—Progress Reports for Arsenic/Lithium Remedy
Selection (January and July 2023)*

**Seventh 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 (specific to arsenic) and per the requirements of 40 CFR §257.97(a), this document represents the seventh semiannual progress report (for the period ending January 31, 2023) with regard to the ongoing CCR remedy selection process for the South Settling Pond at the Huntley Generating Station. In addition, this progress report now also encompasses the status of remedy selection for lithium, which was the subject of a subsequent ACM Report completed on March 12, 2021.

As outlined in each of the ACM Reports, 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 for both arsenic and lithium maintain a significant inter-dependency with the findings, outcome and corresponding BCP remedy evaluation activities.

With respect to the BCP, the NYSDEC-Region 9 issued a Fact Sheet (previously attached to the first semiannual progress report; January 2020) that provided an overview of the South Parcel (NYSDEC Site No. C915337), and advertised a public comment period on the Remedial Investigation Work Plan (RIWP). The final approved RIWP was issued in late-July 2020, with supporting field work and sampling initially performed during October-November 2020, followed by a second round of field work conducted July and September 2021 to address identified data gaps. In mid-January 2022, Huntley Power LLC met with the NYSDEC to discuss preliminary remedial strategies under the BCP, and provide an overview of the elements being considered as part of a conceptual remedy under the CCR framework.

These efforts resulted in submittal of a draft RI Report to the NYSDEC in early-May 2022, and submittal of a draft Alternatives Analysis Report & Remedial Action Work Plan (AAR/RAWP) on June 28, 2022. Within this latter document, various remedial options were presented, with identification of a proposed remedy for soils and groundwater, including a remediation strategy for the South Settling Pond that is responsive to the CCR Rule. NYSDEC's comments on the draft AAR/RAWP were received on November 29, 2022 and are currently being addressed, including required collection of some limited additional groundwater data. A revised AAR/RAWP will be submitted to the NYSDEC on or before April 16, 2023 per the current schedule obligations.

Following finalization and NYSDEC's documented acceptance of the revised AAR/RAWP, and a subsequent public comment period, a formal Public Meeting will be held to jointly present the components of the proposed remedy within the context of the BCP and CCR program frameworks. At present, it is anticipated that the Public Meeting [compliant with §257.96(e) of the CCR Rule] will take place before the end of Calendar Year 2023, with final remedy selection occurring either in late-2023 or early-2024.

Concurrent with the above and as required, Huntley Power LLC will continue to conduct groundwater Assessment Monitoring events for the South Settling Pond. The next semiannual remedy selection progress report will provide an update for the period covering February 1, 2023 through July 31, 2023.

**Eighth 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 (specific to arsenic) and per the requirements of 40 CFR §257.97(a), this document represents the eighth semiannual progress report (for the period ending July 31, 2023) with regard to the ongoing CCR remedy selection process for the South Settling Pond at the Huntley Generating Station. In addition, this progress report now also encompasses the status of remedy selection for lithium, which was the subject of a subsequent ACM Report completed on March 12, 2021. However, and despite lithium being measured above CCR groundwater protection standards, arsenic has remained the principal driver for future remediation activities at the site. In this regard, it is desired that the ultimate treatment technology selected will be dually effective for both of these CCR Appendix IV constituents.

As outlined in each of the ACM Reports, 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 for both arsenic and lithium maintain a significant inter-dependency with the findings, outcome and corresponding BCP remedy evaluation activities.

With respect to the BCP, the NYSDEC-Region 9 issued a Fact Sheet (previously attached to the first semiannual progress report; January 2020) that provided an overview of the South Parcel (NYSDEC Site No. C915337), and advertised a public comment period on the Remedial Investigation Work Plan (RIWP). The final approved RIWP was issued in late-July 2020, with supporting field work and sampling initially performed during October-November 2020, followed by a second round of field work conducted July and September 2021 to address identified data gaps. In mid-January 2022, Huntley Power LLC met with the NYSDEC to discuss preliminary remedial strategies under the BCP, and provide an overview of the elements being considered as part of a conceptual remedy under the CCR framework.

These efforts resulted in submittal of a draft RI Report to the NYSDEC in early-May 2022, and submittal of a draft Alternatives Analysis Report & Remedial Action Work Plan (AAR/RAWP) on June 28, 2022. Within this latter document, various remedial options were presented, with identification of a proposed remedy for soils and groundwater, including a remediation strategy for the South Settling Pond that is responsive to the CCR Rule. NYSDEC's comments on the draft AAR/RAWP were received on November 29, 2022, and were addressed during early-2023 through collection of additional arsenic groundwater data and performance of limited hydraulic conductivity on selected subsurface soils. These supplemental results, which were compiled into a revised RI Report and submitted to the NYSDEC on April 19, 2023, provided ample evidence that the proposed phytoremediation technology (as documented in the draft AAR/RAWP for managing arsenic in groundwater) would not be effective under the present site conditions. Following this submittal, subsequent additional comments were received from NYSDEC regarding arsenic remediation and the need for further characterization of the eastern berm soil materials prior to their potential use as on-site backfill during overall remedy implementation.

In response to these most recent comments, Huntley Power LLC has prepared a Bench Study Work Plan that is targeted for submission to the NYSDEC in early-August 2023. The work plan encompasses further characterization of the eastern berm soils and performance of a focused bench study to examine the potential effectiveness of various arsenic fixation technologies to address the groundwater. It is anticipated that initial bench tests could span over several months to determine potentially suitable treatment reagents, and then potentially followed by focused and more detailed evaluation of the most promising candidates, as necessary. Pilot-scale testing of the fixation technology may be a consideration, but that is not part of the currently outlined scope. Once completed, a summary report discussing the findings from the bench study and the eastern berm soils characterization efforts will be provided to the NYSDEC. Ultimately, a revised AAR/RAWP will be prepared at such time that confidence is reached on the application of an acceptable technology to treat the arsenic in groundwater.

Following finalization and NYSDEC's documented acceptance of the revised AAR/RAWP, and a subsequent public comment period, a formal Public Meeting will be held to jointly present the components of the proposed remedy within the context of the BCP and CCR program frameworks. At present, it is anticipated that the Public Meeting [compliant with §257.96(e) of the CCR Rule] could still take place in late-2023, with final remedy selection occurring most likely in early-2024 followed by the start of remedy implementation by mid-2024.

Concurrent with the above and as required, Huntley Power LLC will continue to conduct groundwater Assessment Monitoring events for the South Settling Pond. The next semiannual remedy selection progress report will provide an update for the period covering August 1, 2023 through January 31, 2024.