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GZA GeoEnvironmental of NY
300 Pearl Street
Suite 700
Buffalo, NY 14202
T: 716.685.2300
F: 716.248.1472
www.gza.com



October 6, 2025
File: 21.0056983.00

Mr. George Streit
george.streit@nrgenergy.com
Huntley Power LLC
3500 River Road
Tonawanda, NY 14150

Re: CCR Landfill 2025 Annual Inspection Report
Huntley Generating Station
Tonawanda, New York

Dear Mr. Streit:

GZA GeoEnvironmental of New York (GZA) presents this 2025 Annual Landfill Inspection report to Huntley Power LLC (Huntley) for the existing coal combustion residuals (CCR) landfill units at the Huntley Generating Station landfill located in Tonawanda, New York (Site). This annual inspection is required by the United States Environmental Protection Agencies (USEPA) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, as presented in the Federal Register Volume 80 No 74 dated April 17, 2015. In accordance with the CCR Rule (40 CFR 257.84), owners/operators of CCR landfill units are required to be inspected on a periodic basis by a qualified professional engineer to check the design, construction, operation and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.

Document Review

The required periodic inspections presented in the CCR Rule are intended for open and active landfills and are not required for closed or inactive landfills. As such, the active/open ash waste cells for the Huntley Power Site are identified as upper portions of Cells A and D, and all of Cell C. The remaining landfill cells at the Site are considered inactive (i.e., closed) and are not included with this annual inspection report. The limits of the active cells requiring this annual inspection report are shown on the attached figure prepared by Wendel for the 2024 fill progression survey (see **Figure 1**). Areas designated as future Cell B (located between Cells A and C) and Cell E (located south of Cell A) have not yet been constructed.

The Huntley Power landfill is currently permitted (ID#9-1464-00089/000010) with the New York State Department of Environmental Conservation (NYSDEC) to accept residual coal ash waste generated from the Huntley Power facility through January 3, 2023. This permit is currently undergoing the renewal process with NYSDEC to extend the Site permit for an additional ten-year period. We note that the Huntley Power plant has ceased electrical generation operations and is in the process of being shut down. A review of Wendel's 2024 (most recent) fill progression report for the Cells A, C and D indicates the following information.



Landfill Cell	Waste Received in 2024 (cy)	Current Ash Volume (cy)	Volume Remaining (cy)
A	0	509,264	196,276
C	457	415,560	363,483
D	0	537,869	47,791
Totals for A, C & D	457	1,462,693	607,550

cy = cubic yards

The 2025 weekly landfill inspection forms prepared by Huntley Power Site personnel did not identify any concerns or complaints related to the operation and/or maintenance of the active ash landfill cells.

Site Observations

GZA visited the Huntley CCR Landfill Site on September 5th, 2025, to make observations of the active portions of landfill Cells A, C and D. The following is a summary of our observations made at each active cell.

Cell A: This area was previously covered with topsoil and seeded for use as a temporary cover and no areas of exposed CCR waste were observed. The Cell A side slopes at the lower elevations were observed with final cover systems previously constructed in general accordance with its intended design (side slopes not exceeding 33% or 3 Horizontal: 1 Vertical (3H:1V)) and included intermittent benches and rip-rap lined drainage channels at select locations of the cell. The upper elevations were observed generally consisting of a vegetated temporary cover system with approximate 5% slopes. In general, no deficiencies or structural concerns were observed.

Cell C: During our 2025 Site visit, the side slopes and upper portions of the waste areas were observed to be in similar condition to observations made in 2024 with a vegetated cover (similar to the upper portions of Cell A) with no observable areas of exposed CCR waste. The previous regrading and vegetated temporary cover system appears to be in general accordance with intended designs and overall appears to be stable without evidence of structural instability issues (e.g., slumps, cracks, settlement, etc.). The cell side slopes were observed to be no steeper than 3H:1V and no evidence of significant rainfall runoff erosion rills were observed.

Cell D: The temporary soil cover system observed on Cell D generally appears similar to observations made in 2024 with no observable areas of exposed CCR waste. The previously completed regrading activities and vegetative growth within the cell appears to be in general accordance with intended designs and overall appears to be stable without evidence of structural instability issues (e.g., slumps, cracks, settlement, etc.). The northern, eastern and southern side slopes of Cell D were observed having final cover systems, including interim benches and drainage features. The cell side slopes were observed to be no steeper than 3H:1V.

Overall, the work face areas of the active cells appeared to be graded in general accordance with the proposed design configurations. The side slopes and other areas were observed covered with a sufficient vegetative cover of which portions appeared to have been recently mowed and the slopes were observed in good condition with no evidence of actual, or potential for, structural instability or erosion or unsafe conditions. Similar to the most recent annual inspection made at the end of 2024, this inspection identified no areas of concern or areas evident of structural instability. No significant changes pertaining to the design, operation and maintenance have been made to the active landfill cells within the last year. In general, the ongoing maintenance (grass cutting) and temporary cover system over the CCR waste appear to be in compliance with the cell design and permit



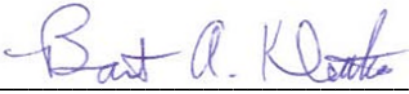
requirements. No areas of exposed CCR waste were observed within Cells A, C and/or D during our 2025 site visit.

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of §257.84 and has visited and examined the Huntley Station Landfill or has supervised examination of the facilities by appropriately qualified personnel. The undersigned registered professional engineer attests that this Annual Inspection Report has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and meets the requirements of §257.84, and that this Report is adequate for the Huntley Station. This certification was prepared as required by §257.84(b)(2).

Name of Professional Engineer: Bart A. Klettke, P.E.

Company: GZA GEOENVIRONMENTAL OF NEW YORK

Signature: 


Date: October 6, 2025
PE Registration State: New York
PE Registration Number: 069423-01
Professional Engineer Seal:

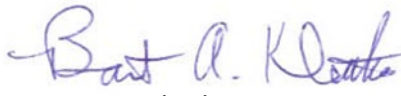


We trust this information satisfies your needs for this project.

Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK


Daniel J. Troy, P.E.
Senior Project Manager


Bart A. Klettke, P.E.
Principal

Attachments: Figure 1 - 2024 Huntley Fill Progression Survey – General Plan

