



Proactive by Design

GEOTECHNICAL
ENVIRONMENTAL
ECOLOGICAL
WATER
CONSTRUCTION
MANAGEMENT

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October 14, 2016
File: 21.0056797.00

Mr. Kevin Schroeder
Kevin.schroeder@nrenergy.com
Huntley Power LLC
Tonawanda, NY 14150

Re: CCR Surface Impoundment Post Closure Care Plan
Huntley Generating Station
Tonawanda, New York

Dear Mr. Schroeder:

GZA GeoEnvironmental of New York (GZA) presents this post closure care plan to Huntley Power LLC (Huntley) for the existing coal combustion residuals (CCR) surface impoundment (identified as the South Settling Pond) located at the Huntley facility in Tonawanda New York (Site). This plan is required by the United States Environmental Protection Agency's (USEPAs) 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 §257.104(d)), owners/operators of a CCR unit must prepare a written closure plan that includes, at a minimum, information specified in paragraphs (d)(1)(i) through (iii) of the Section. This plan is required for CCR units subject to closure requirements under §257.102 when CCR remains in place and has a final cover system meeting the requirements of §257.102(d)(3).

Site Background

The CCR surface impoundment for the Site is identified as the South Settling Pond that was used for discharge of plant-generated process water including CCR sluice water and non-CCR water collected from sump pumps, non-contact cooling water, storm water and other various sources. As of February 29, 2016, the facility boilers removed from service and the last of the CCR sluice water was discharged into the South Pond in late March 2016 although plant-associated non-CCR water continues to be discharged. The outfall for the South Pond is identified as Outfall 008 and is regulated under the New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) permit #9-1464-00130/00003. Once the pond is closed (in accordance with §257.102(d)(3)) the Outfall 008 will be removed and the final cover for the pond will be sloped and graded to allow surface drainage to flow to one of the other facility SPDES permitted outfalls. The limits of the Huntley south settling pond included in this post closure care plan are shown on the attached Figure 1.

Information required by §257.104(d)(i) through (iii) for the required post closure care plan is as follows.



- i) Monitoring and Maintenance - §257.104(d)(1)(i)** – *A description of the monitoring and maintenance activities required in paragraph (b) of this section for the CCR unit, and the frequency at which these activities will be performed.*

The owner/operator of the Huntley South Settling Pond will perform inspections of the closed surface impoundment final cover on a regular, periodic basis. Concerns identified during the inspection process will be remedied as needed/identified. Maintenance and monitoring of the existing groundwater monitoring system (i.e., monitoring wells) that were installed as a requirement of the CCR Rule will be done on an as-needed/identified basis in accordance with §257.104(b)(3). Groundwater monitoring parameters will be in accordance with the parameters specified in Appendix III to Part 257 and in accordance with 257.90-98.

Additionally, closure activities planned for the south settling pond will include removal of the outfall pipe (identified as Outfall 008) and the final cover system will be regraded to direct surface water drainage to another site SPDES permitted outfall. The Huntley CCR surface impoundment does not have a leachate collection system.

Mowing of the grass cover system is anticipated to be performed on a weekly basis during the growing season although will be based on the rate of growth. Areas of erosion or lost vegetation will be repaired and reseeded on an as-needed basis as identified during routine inspections.

- ii) Post Closure Contacts - §257.104(d)(1)(ii)** – *The name address, telephone number, and e-mail address of the person or office to contact about the facility during the post-closure period.*

The contact information for the CCR landfill during the post closure period is as follows.

Huntley Power, LLC
Attn: Plant Manager
3500 River Road
Tonawanda, New York 14150
(716) 879-3850 - Gatehouse number
www.nrg.com

- iii) Planned Use During Post Closure Period** – *A description of the planned uses of the property during the post-closure period. Post closure use of the property shall not disturb the integrity of the final cover, liner(s), or any other component of the containment system, or the function of the monitoring systems unless necessary to comply with the requirements of this subpart.*

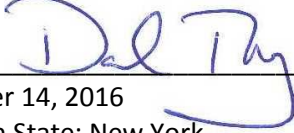
The Huntley CCR surface impoundment will eventually be closed and covered in accordance with 257.102 (including removal and backfilling of the Outfall 008) and the final use for the area is anticipated to be a privately-owned, green space that will be secured with perimeter fencing. As such, disturbances to the final cover system (in accordance with §257.102(d)(3)) and other related surface impoundment systems is expected to be negligible.



PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of §257.104 Post Closure Care Requirements. The undersigned registered professional engineer attests that this CCR Landfill Post Closure Care Plan has been prepared in accordance with good engineering practice, including consideration of applicable state regulatory requirements and meets the requirements of §257.104(d), and that this plan is adequate for NRG - Huntley Power. This certification was prepared as required by §257.104(d)(2)(iii).

Name of Professional Engineer: Daniel J. Troy, P.E.
Company: GZA GEOENVIRONMENTAL OF NEW YORK

Signature: 
Date: October 14, 2016
PE Registration State: New York
PE Registration Number: 081139-1



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 – Huntley South Settling Pond Site Plan

© 2016 - GZA GeoEnvironmental of NY GZA-K:\PROJECTS\66700s\66757 Huntley Power LLC CCR Certification\Site Annual Inspection\Figure 1 Annual Inspection\Oct 2016.dwg [FIGURE 1] October 12, 2016 - 4:50pm ltheadere.klt@w



NORTH EQUALIZATION
BASIN (#1):

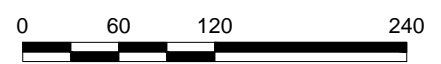
SOUTH ASH SETTLING BASIN
ESTIMATED BOTTOM ELEV.: 564.5'±
ESTIMATED BOTTOM AREA: 114,000 SQ. FT.
ESTIMATED TOP ELEV.: 569.0'±
ESTIMATED TOP AREA: 200,000 SQ. FT.


SOUTH EQUALIZATION
BASIN (#2)

OUTFALL 008

NIAGARA RIVER
FLOW

RIVER ROAD



NO.	ISSUE/DESCRIPTION	BY	DATE
CCR SURFACE IMPOUNDMENT CLOSURE PLAN HUNTLEY POWER PLANT TONAWANDA, NEW YORK			
SOUTH SETTLEMENT POND			
PREPARED BY:  GZA GeoEnvironmental Inc. Engineers and Scientists 535 WASHINGTON STREET 11th FLOOR BUFFALO, NEW YORK 14203 (716) 885-2300		PREPARED FOR: HUNTLEY POWER	
PROJ MGR:	BAK	REVIEWED BY:	BAK
DESIGNED BY:		DRAWN BY:	TAK
DATE:	OCTOBER 2016	PROJECT NO.:	21.0056797.00
		CHECKED BY:	DJT
		SCALE:	AS SHOWN
		REVISION NO.:	
			FIGURE 1

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