



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@nrgenergy.com
Huntley Power LLC
Tonawanda, NY 14150

Re: CCR Surface Impoundment Construction History
Huntley Generating Station
Tonawanda, New York

Dear Mr. Schroeder:

GZA GeoEnvironmental of New York (GZA) presents this letter to Huntley Power LLC (Huntley) with respect to the existing coal combustion residuals (CCR) surface impoundment (identified as the South Settling Pond) at the Huntley Generating Station located in Tonawanda, New York (Site). This Construction History information 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 §257.73(c), owners/operators of existing CCR surface impoundments are required to compile a history of construction, which shall contain, to the extent feasible, the information specified in paragraphs (c)(1)(i) through (xi) of section 257.73(c).

- i) The facility owners name is Huntley Power, LLC and the facility is addressed at 3500 River Road Tonawanda, New York 14150. The site surface impoundment is referred to as "South Settling Pond" and is permitted under the New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) Permit # 9-1464-00130/00003 which identifies the associated discharge outlet to the Niagara River as "Outfall #008".
- ii) The location of the Huntley Generating Station and associated CCR surface impoundment are shown on the attached Figure 1- Locus Plan.
- iii) The Huntley South Settling Pond was constructed to accept process water from the power plant that included CCR sluice water and other non-CCR (water associated from sump pumps, non-contact cooling water, storm water and other various sources). As of February 29, 2016, CCR sluice water discharge into the settling pond was ceased as the power plant boilers were taken out of service. Non-CCR water continues to be discharged into the pond until a later date when the water will be re-



routed to another Site specific SPDES permitted outfall at which time the pond will be closed in accordance with both CCR Rule and NYSDEC specific requirements.

iv) The contributory watershed associated with the Huntley South Settling Pond has no formal name and previous studies at the South Settling Pond have estimated the area of surrounding contribution into the pond is about 343,700 square feet (sf) or about ± 7.9 acres and is limited to areas located within the facility property boundary. The South Settling Pond eventually discharges into the Niagara River located to the west via an outfall pipe designated as #008.

v) Cross sections of the South Settling Pond and associated embankment are attached to this document as Figures 3 and 5 and shows approximate locations, elevations, and depths of the various construction materials. Previous embankment evaluations at the Site (e.g., test borings) identified the various soil units that comprise the embankment foundation with the following soil properties/parameters (based on laboratory testing and test boring density values).

Soil Type	Total Unit Weight (pcf)	Saturated Unit Weight (pcf)	Friction Angle
Riprap/Stone Layer (GW)	140	140	40
Fill Material (SM, SW, ML, GL)	128	130	30
Silt and Fine Sand Soil (ML, SM)	120.5	124.5	25
Sand (SW)	126	130	19

The remainder of the pond was reportedly excavated into native soil assumed to consist of similar properties of the silt and sand units listed above. It should be noted that a review of a 2008 pond dredging report indicated that hard pan conditions were encountered near the pond inlet area and limited dredging activities to elevations (el) of about 564.5± ft. Specific information of the identified hard pan soils was not available.

vi) The current configuration of the Huntley surface impoundment was reportedly designed and constructed in the mid to late 1970's for the purpose of receiving storm water runoff and process water associated with the Huntley Generation Plant. Process water included CCR sluice water (associated with the bottom ash removal system) and non-CCR water. The CCR sluice water was historically pumped to the settling pond, where the larger solids (i.e., bottom ash) were allowed to settle out closer to the pipe discharge into the pond and the smaller particles (i.e., fly ash) settled out at distances further from the discharge pipes. During normal plant operations (prior to the plant shut-down), the bottom of the settling pond nearest the CCR and Non-CCR waste inlet was routinely dredged using a long stick excavator to remove the larger solid CCR material for disposal at the facilities off-site CCR landfill.



The settling pond was historically reported to be about 6 feet deep when the facility was in full operation. However, since the water levels have been reduced due to elimination of CCR sluice water and due to accumulating CCR since the 2008 pond dredging, the pond level is estimated to have been lowered. The pond was reportedly excavated into the native soil. Additionally, as part of regular maintenance operations at the Site, the entire Settling Pond was dredged to remove accumulated sediments (e.g., ash) approximately every 5 years with the last full pond dredging being done in December of 2008. The last full pond dredging reportedly removed about 20,000 cubic yards of material (accumulated CCR and soil). A review of the dredging report indicated an elevation of 563.5 ft was targeted for a majority of the pond although due to hardpan conditions, dredging depths had to be raised to el. 564.5 ft near the pond inlet.

The South Settling Pond includes an embankment located between the south end of the pond and the Niagara River. As shown on the attached Figures 4 and 5, the embankment includes an asphalt paved access road over its top portion and rip rap armor side slopes between the asphalt and the shorelines on both sides of the embankment. The rip rap armor located on the settling pond side is considered to be a dry rip rap (i.e., not grouted) and has some grassy vegetation. The rip rap on the Niagara River side is interlocked with a cement grout to minimize impacts from the Niagara River (e.g., current, ice, wave action, etc.). Additionally, observations and available design drawings of the embankment indicates an approximate 12-inch thick layer of crushed stone underlain by a woven/plastic geotextile separation fabric is located below the embankment rip rap slopes. Approximate 4-inch diameter clay weep pipes are also included on the Niagara River side of the embankment and are spaced about 5 feet from each other at elevations slightly above normal river elevation. These weep pipes are designed to drain accumulated water through the rip rap side slope.

A corrugated metal discharge pipe (CMP) penetrates the embankment that allows drainage from the settling pond to the Niagara River. This CMP (identified as outfall #008) is oval shaped, with approximate dimensions of 65-inches tall by 92 inches wide. The invert elevation for the Settling Pond side of the pipe is about el. 569.0± ft and its river-side discharge invert el. 568.0± ft.

The ground surface elevations of the existing embankment range from el. 566 ft at the Niagara River shoreline (outside toe-of-slope) to el. 575.4 ft across the paved access road on top of the embankment to el. 566 ft at the pond shoreline (inside toe-of-slope).

Limited information was available pertaining to construction methodology (e.g., fill lift thickness, compactive effort, proctor values, type of equipment, etc.) however, engineering properties of the existing materials used were determined from a previously completed embankment evaluation as discussed above.



(vii) Plan views and cross sections of the South Settling Pond and the associated embankment at Outfall #008 for the Huntley facility are attached. These figures were generated based on information obtained from the 2008 dredging plan and the February 29, 2015 Embankment Evaluation Assessment report completed at the Site.

(viii) A water level gauge was observed secured to the metal framed walkway proximate to the pond Outfall #008. The base of the measuring rod was reportedly set to the elevation of the outfall pipe invert elevation to calculate and monitor water surface elevations and flow rates (in gpm) through the outfall pipe.

(ix) An area capacity curve for the Huntley CCR surface impoundment is attached to this document.

(x) The Huntley South Settling Pond is not equipped with a spillway or diversions systems although the large oval shaped CMP drainage outlet (#008) has been identified in the February 20, 2015 Embankment Evaluation Report to be of sufficient size to allow more than 3-feet of freeboard during ½ probable maximum flood (PMF) conditions (el. 571.4 ft.) for the pond.

(xi) Documentation pertaining to construction specifications and/or provisions for surveillance during construction of the Huntley South Settling Pond was not available for review with the exception of a few apparent design phase drawings. We note that the available drawings do not necessarily reflect the current CCR surface impoundment features/materials.

(xii) No record or knowledge of structural instability of the Huntley CCR surface impoundment was known or reported.

As specified under §257.73(c)(2), if there is a significant change to the information compiled under section §257.73(c)(1), this information will be updated accordingly and will be added to the facilities operating record as required by §257.105(f)(9).

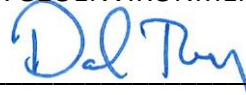


PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of §257.73(c)(1) and has visited and examined the Huntley Power’s South Settling Pond surface impoundment and available historical documentation. The undersigned registered professional engineer attests that the information provided for the existing surface impoundment (identified as the Huntley Plant south settling pond) has been prepared in accordance with the accepted practice of engineering. This certification was prepared as required by §257.73(c)(1).

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.

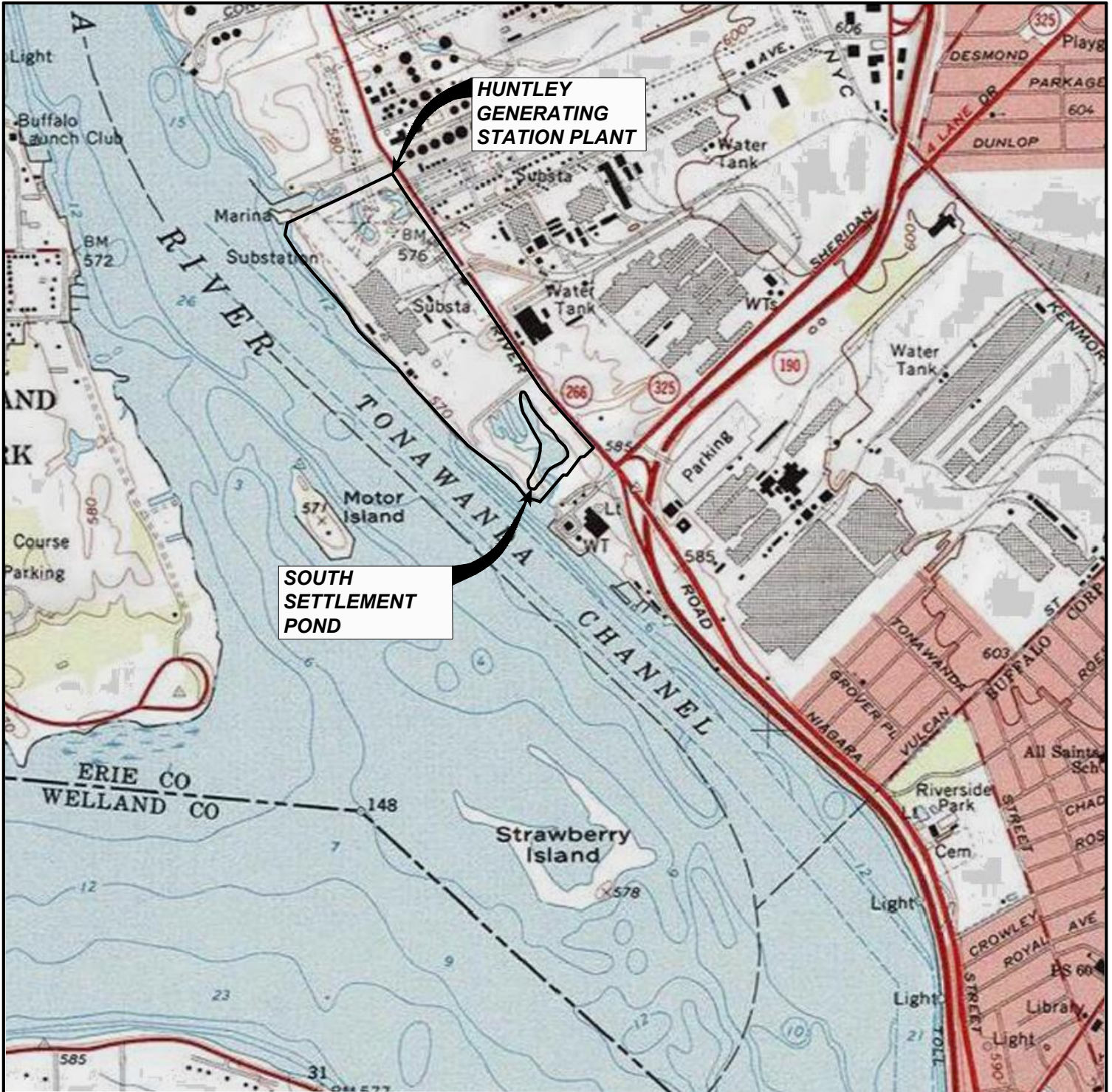
Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK


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


Bart A. Klettke, P.E.
Principal

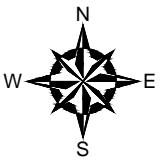
- Attachments:
- Figure 1 – Locus Plan
 - Figure 2 – South Settling Pond Plan View
 - Figure 3 – South Settling Pond Cross Sections A-A & B-B
 - Figure 4 – South Settling Pond Embankment Plan View
 - Figure 5 – South Settling Pond Embankment Cross Section
 - Figure 6 – South Settling Pond Area-Capacity Curve
 - Attachment A – Historical Site Drawings



SOUTH SETTLEMENT POND

HUNTLEY GENERATING STATION PLANT

NOTE:
BASE MAP ADAPTED FROM USA TOPO MAPS USING ArcGIS AUTOCAD PLUGIN



UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

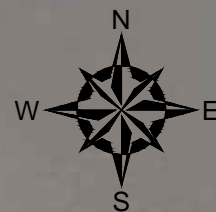
PREPARED BY:
GZA GeoEnvironmental of N.Y.
Engineers and Scientists
535 WASHINGTON STREET 11th FLOOR
BUFFALO, NEW YORK 14203
(716) 685-2300

LOCUS PLAN

PROJ MGR: DJT REVIEWED BY: BAK
DESIGNED BY: DJT DRAWN BY: TAK

NO.	ISSUE/DESCRIPTION	BY	DATE
	CCR SURFACE IMPOUNDMENT CONSTRUCTION HISTORY		
	NRG HUNTLEY PLANT TONAWANDA, NEW YORK		
PREPARED FOR:			
NRG HUNTLEY POWER, LLC 3500 RIVER ROAD TONAWANDA, NEW YORK			
PROJECT NO.	21.0056797.00	REVISION NO.	
DATE	OCTOBER 2016	SCALE:	AS SHOWN

FIGURE
1



PROCESS INFLOW PIPES
 MAXIMUM HISTORIC INFLOW: 6,800 GPM
 (CCR SLUICE WATER AND NON-CCR WATER)
 CURRENT FLOW: 1500 ± GPM
 (NON-CCR WATER ONLY)

APPROXIMATE AREA OF
 HISTORIC ROUTINE CCR
 DREDGING

SOUTH SETTLING POND
 ESTIMATED BOTTOM ELEV: 563'± TO 564.5' ±
 ESTIMATED BOTTOM AREA: 114,000 SQ. FT.
 ESTIMATED TOP ELEV.: 575'
 ESTIMATED TOP AREA: 200,000 SQ. FT.
 ESTIMATED CONTRIBUTORY WATERSHED
 AREA (RED BOUNDARY) = 343,700 SQ. FT.

NORTH EQUALIZATION
 BASIN (#1):

NORMAL POOL EL. 569.9'
 (AT 6800 GPM FLOW RATE)
 EL. 569.25'
 (AT 1500 GPM FLOW RATE)

SOUTH EQUALIZATION
 BASIN (#2):

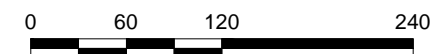
NIAGARA RIVER EL. 566'± (BASED ON
 MAY 2009 SURVEY MEASUREMENT)
 500-YR FLOOD TAILWATER EL. 570.7'

92" x 65" STEEL PIPE ARCH OUTFALL #008
 LENGTH: 55±
 INVERT ELEVS.:
 INLET: 569'±
 OUTLET @ NIAGARA RIVER: 568'±
 RIVER ELEV. @ 566'± (MEASURED APRIL
 2009)
 TOP OF BERM ELEV. OVER PIPE: 575.4'

RIVER ROAD

NOTES

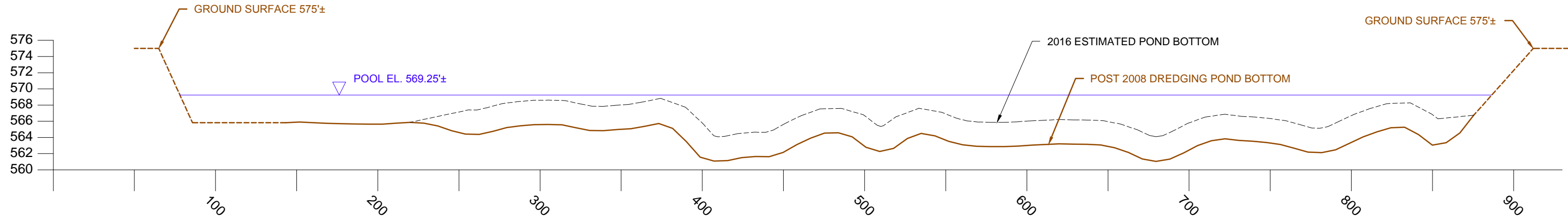
- FIGURE OBTAINED FROM REPORT TITLED "NRG HUNTLEY POND EMBANKMENT EVALUATION REPORT" PREPARED BY GZA GEOENVIRONMENTAL OF NY DATED FEBRUARY 20, 2015.
- BASE MAP ADAPTED FROM A 2015 AERIAL PHOTO DOWNLOADED FROM GOOGLE EARTH PRO AND FIELD OBSERVATIONS.
- THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.
- EQUALIZATION PONDS SHOWN DO NOT STORE CCR WASTE WATER AND THEREFORE ARE NOT IN CONSTRUCTION HISTORY.



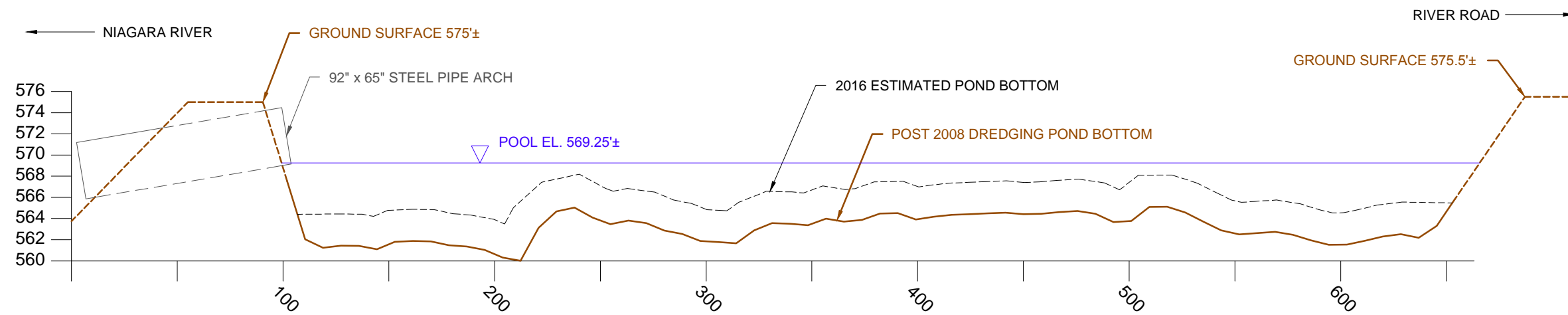
NO.	ISSUE/DESCRIPTION	BY	DATE
CCR SURFACE IMPOUNDMENT CONSTRUCTION HISTORY NRG HUNTLEY PLANT TONAWANDA, NEW YORK			
SOUTH SETTLING POND PLAN VIEW			
PREPARED BY: GZA GeoEnvironmental Inc. Engineers and Scientists 535 WASHINGTON STREET 11th FLOOR BUFFALO, NEW YORK 14203 (716) 685-2300		PREPARED FOR: NRG HUNTLEY POWER, LLC 3500 RIVER ROAD TONAWANDA, NEW YORK	
PROJ MGR: DJT	REVIEWED BY: BAK	CHECKED BY: DJT	FIGURE 2
DESIGNED BY:	DRAWN BY: TAK	SCALE: AS SHOWN	
DATE OCTOBER 2016	PROJECT NO. 21.0056797.00	REVISION NO.	

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SECTION A-A NORTH-SOUTH± ACROSS SOUTH SETTLING POND



SECTION B-B WEST-EAST± ACROSS SOUTH SETTLING POND

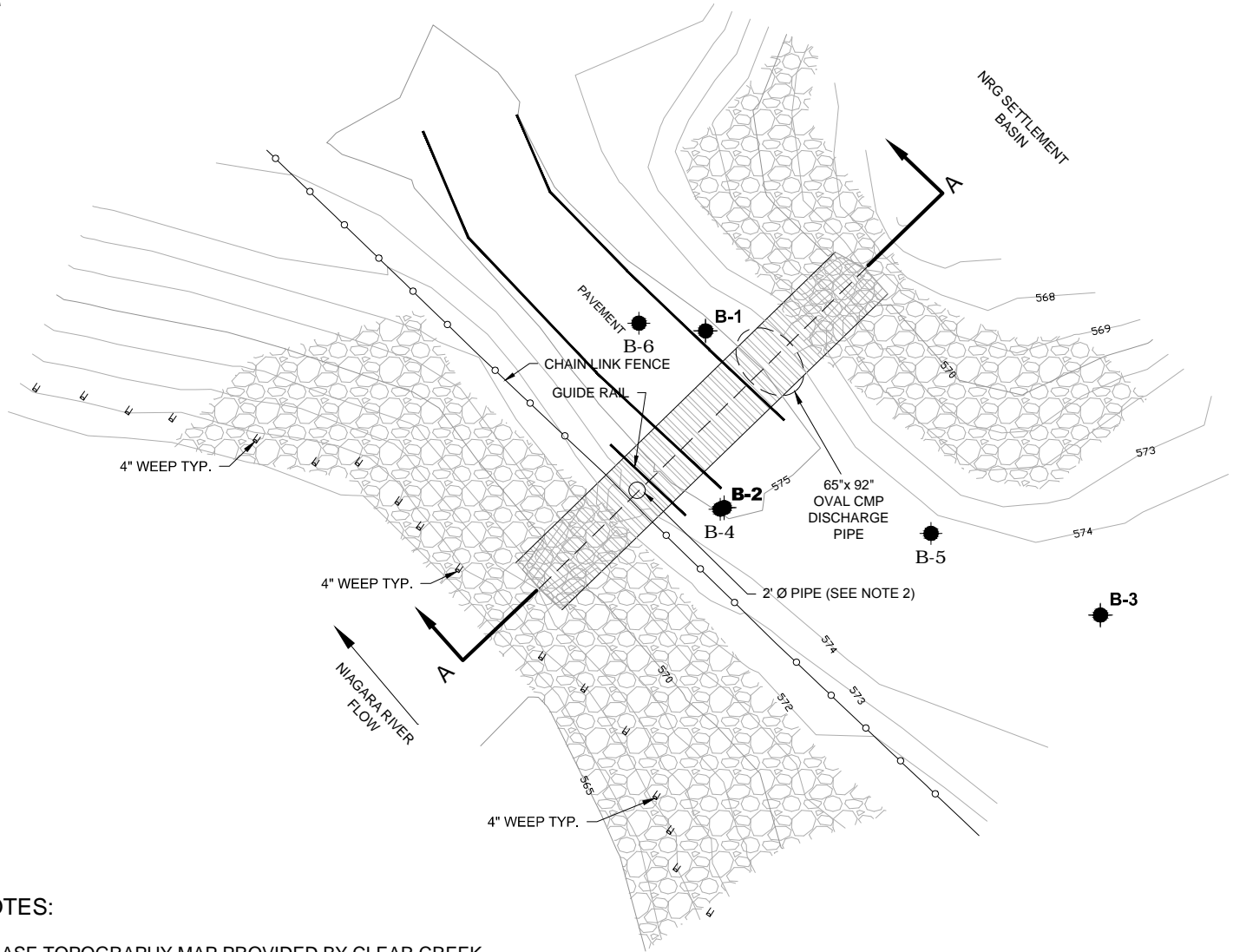


NOTES

1. ELEVATIONS DATA OBTAINED FROM FINAL SURVEY DATA PROVIDED BY INFRASTRUCTURE ALTERNATIVES DATED JANUARY, 2009.
2. ESTIMATED POND BOTTOM AFTER 2008 DREDGING ASSUMED TO BE ABOUT 3'± THICK, BASED ON ASSUMED 23,000 CY OF ACCUMULATED CCR SLUICE ACROSS 200,000 SF. POND FLOOR.

NO.	ISSUE/DESCRIPTION	BY	DATE
CCR SURFACE IMPOUNDMENT CONSTRUCTION HISTORY NRG HUNTLEY PLANT TONAWANDA, NEW YORK			
SOUTH SETTLING POND CROSS SECTIONS A-A & B-B			
PREPARED BY: GZA GeoEnvironmental Inc. Engineers and Scientists 535 WASHINGTON STREET 11th FLOOR BUFFALO, NEW YORK 14203 (716) 685-2300		PREPARED FOR: NRG HUNTLEY POWER, LLC 3500 RIVER ROAD TONAWANDA, NEW YORK	
PROJ MGR: DJT	REVIEWED BY: BAK	CHECKED BY: DJT	FIGURE 3
DESIGNED BY:	DRAWN BY: TAK	SCALE: AS SHOWN	
DATE: OCTOBER 2016	PROJECT NO.: 21.0056797.00	REVISION NO.	

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NOTES:

1. BASE TOPOGRAPHY MAP PROVIDED BY CLEAR CREEK LAND SURVEYING, LLC, MAY 2009.
2. LOCATIONS OF B-4, B-5, AND B-6 MADE USING 100' MEASURING TAPE FROM ϵ OF 2' \varnothing PIPE IN CENTER OF DISCHARGE PIPE
3. FIGURE OBTAINED FROM REPORT TITLED "NRG HUNTLEY POND EMBANKMENT EVALUATION REPORT" PREPARED BY GZA GEOENVIRONMENTAL OF NY DATED FEBRUARY, 20 2015.



NO.	ISSUE/DESCRIPTION	BY	DATE

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PREPARED BY:

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 Engineers and Scientists
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 BUFFALO, NEW YORK 14203
 (716) 685-2300

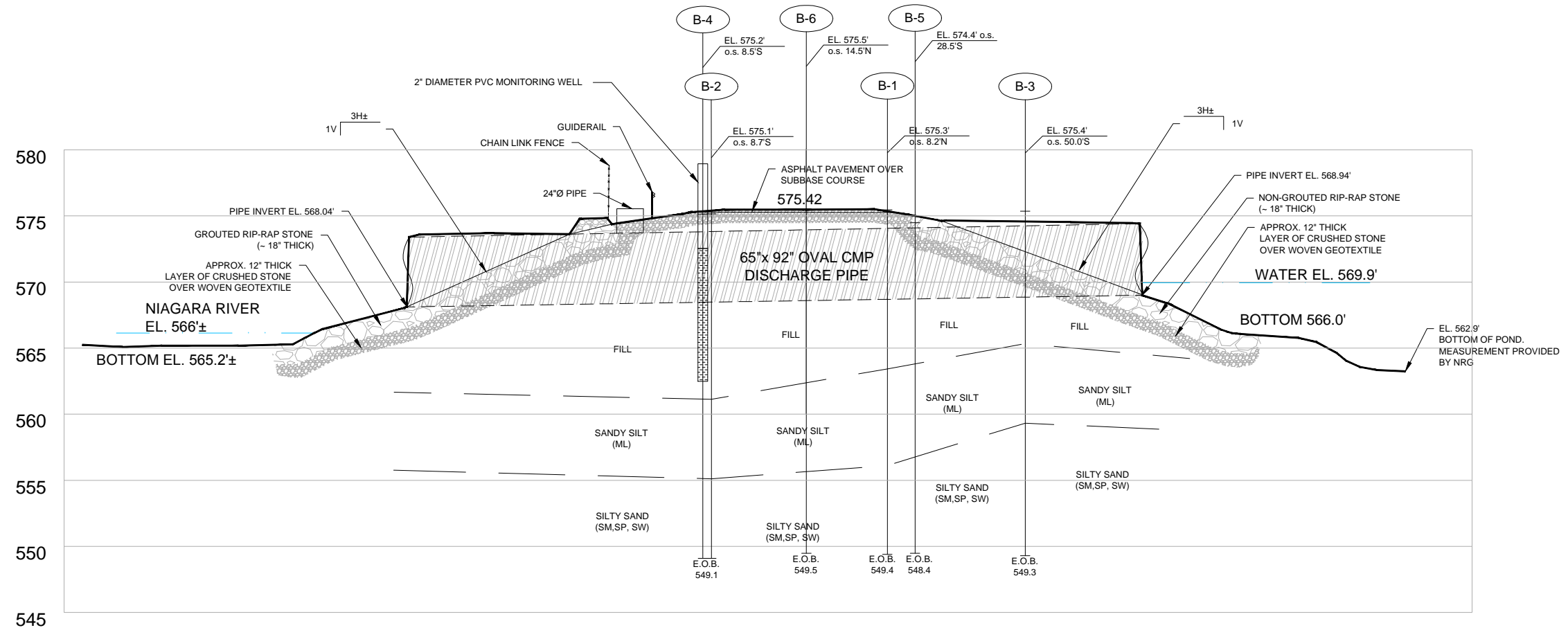
**SOUTH SETTLING POND
 EMBANKMENT PLAN VIEW**

CCR SURFACE IMPOUNDMENT CONSTRUCTION HISTORY
NRG HUNTLEY PLANT
TONAWANDA, NEW YORK

PREPARED FOR:
NRG HUNTLEY POWER, LLC
3500 RIVER ROAD
TONAWANDA, NEW YORK

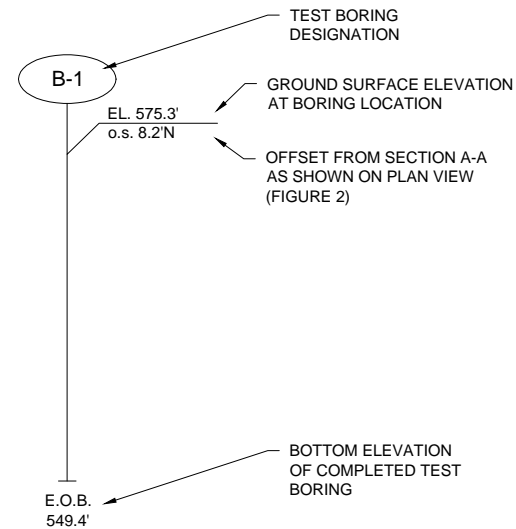
FIGURE
4

PROJ MGR: DJT	REVIEWED BY: BAK	CHECKED BY: DJT	DATE: OCTOBER 2016	PROJECT NO. 21.0056797.00	REVISION NO.
DESIGNED BY: DJT	DRAWN BY: TAK	SCALE: 1" = 20'			



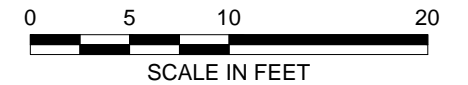
CROSS SECTION A-A
THROUGH ACCESS ROAD

LEGEND:



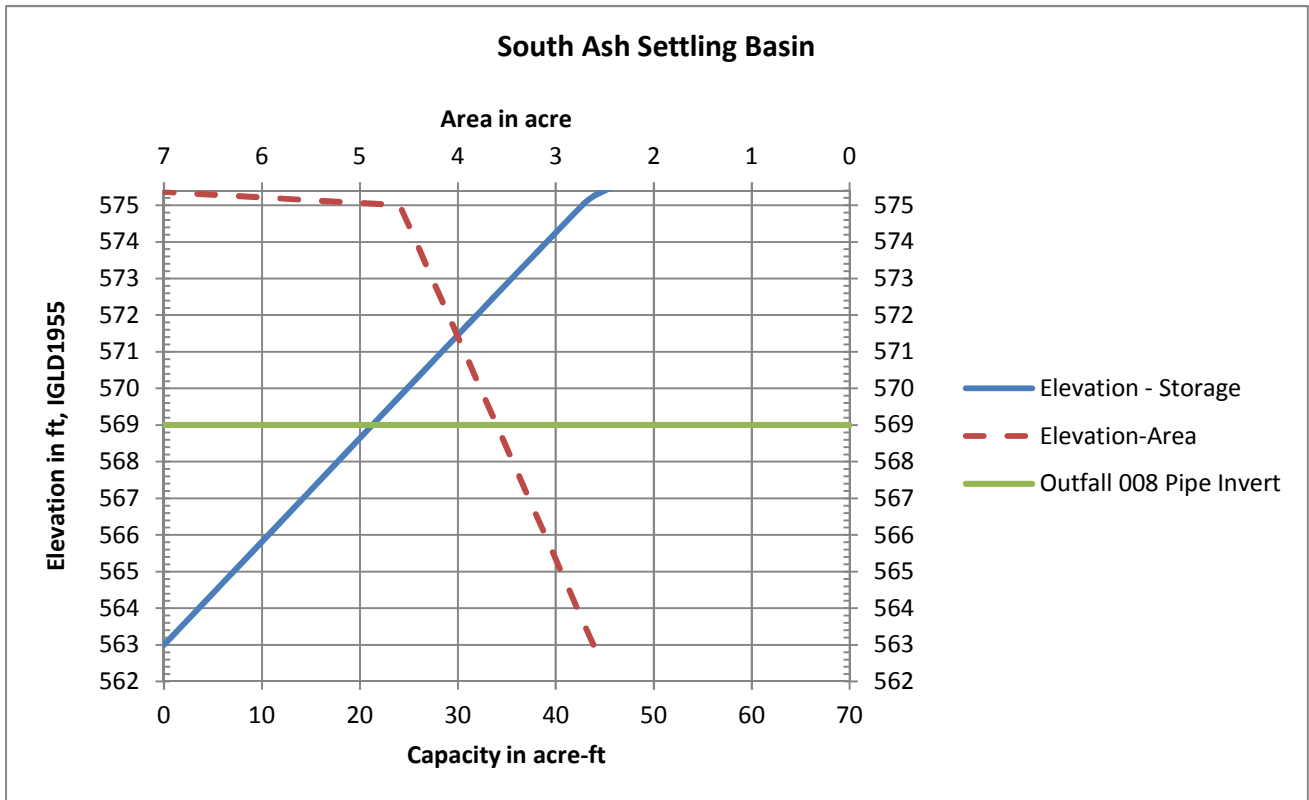
NOTES:

1. BASE TOPOGRAPHY MAP AND ELEVATIONS SHOWN PROVIDED BY CLEAR CREEK LAND SURVEYING, LLC, UNLESS OTHERWISE SPECIFIED.
2. WATER LEVEL MEASUREMENTS SHOWN MADE INSIDE AUGERS AT BORING COMPLETION IN 2009.
3. SEE BORING LOGS FOR ADDITIONAL SUBSURFACE SOIL DESCRIPTIONS.
4. BORINGS B-1 THROUGH B-3 COMPLETED IN APRIL 2009. BORINGS B-4 THROUGH B-6 COMPLETED IN AUGUST 2014.
5. LOCATIONS AND ELEVATIONS OF B-4 THROUGH B-6 WERE MADE USING 100' TAPE MEASUREMENTS AND TYPICAL ROD AND LEVEL MEASUREMENTS FROM SPECIFIC LOCATIONS PREVIOUSLY MEASURED DURING 2009 TOPOGRAPHIC SURVEY
6. FIGURE OBTAINED FROM REPORT TITLED "NRG HUNTLEY POND EMBANKMENT EVALUATION REPORT" PREPARED BY GZA GEOENVIRONMENTAL OF NY DATED FEBRUARY, 20 2015.



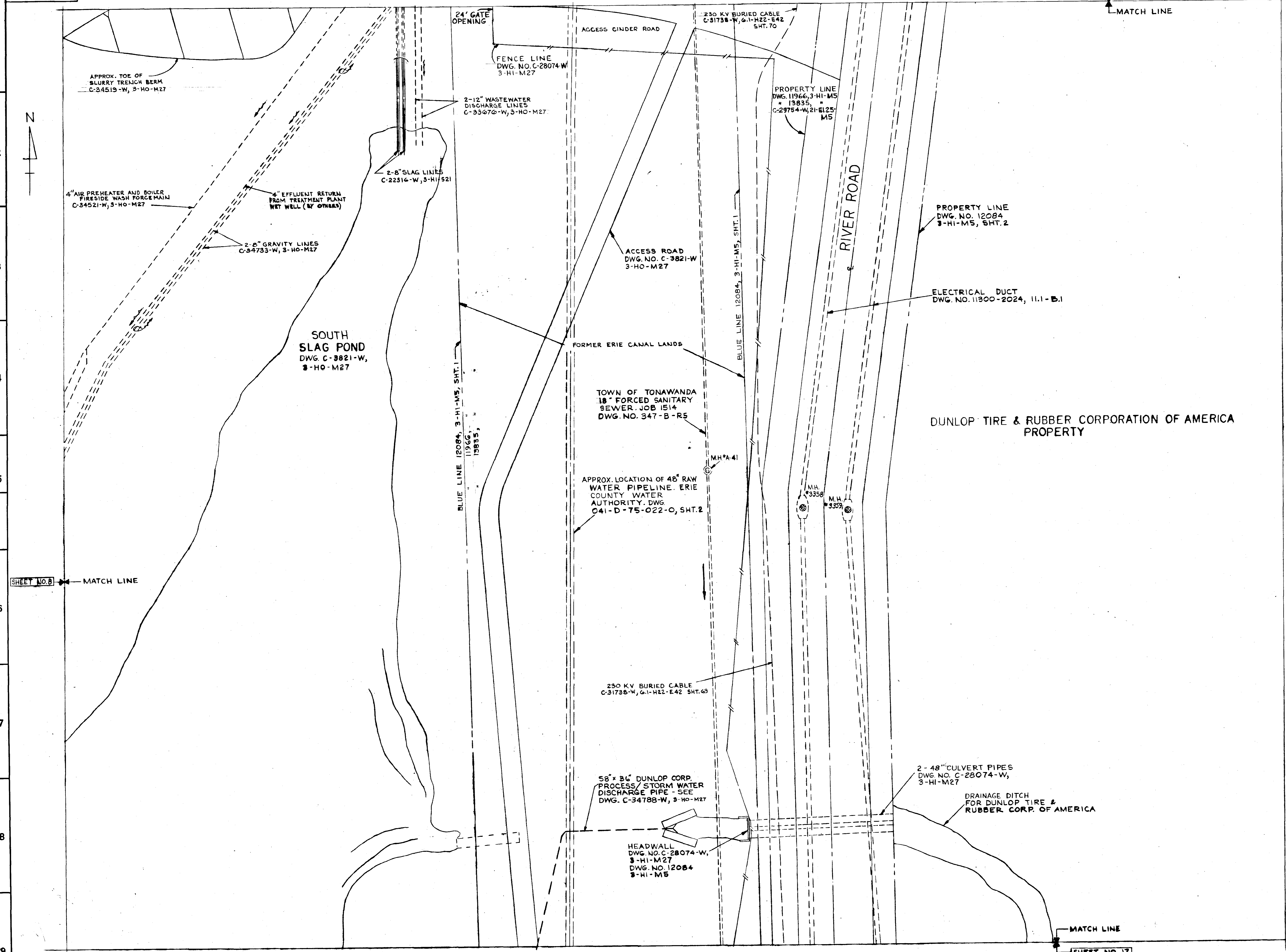
NO.	ISSUE/DESCRIPTION	BY	DATE
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CCR SURFACE IMPOUNDMENT CONSTRUCTION HISTORY NRG HUNTLEY PLANT TONAWANDA, NEW YORK			
SOUTH SETTLING POND EMBANKMENT CROSS SECTION			
PREPARED BY: GZA GeoEnvironmental of N.Y. Engineers and Scientists www.gza.com		PREPARED FOR: NRG HUNTLEY POWER, LLC 3500 RIVER ROAD TONAWANDA, NEW YORK	
PROJ MGR: DJT	REVIEWED BY: BAK	CHECKED BY: DJT	FIGURE 5
DESIGNED BY: TAK	DRAWN BY: TAK	SCALE: 1" = 10'	
DATE: OCTOBER 2016	PROJECT NO: 21.0056797.00	REVISION NO.	

Figure 6
Huntley South Settling Pond Area-Capacity Curve
Huntley Plant, Tonawanda, New York



APPENDIX A
SITE INSPECTION PHOTOGRAPHS

NO.	DATE	BY	DESCRIPTION OF REVISION	CK.	APP.
1			GENERAL REVISION		



SHEET NO. 8 MATCH LINE

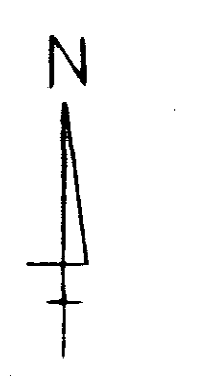
MATCH LINE

SHEET NO. 17

SEE SHEET NO. 1 FOR KEY PLAN AND NOTES.

NIAGARA MOHAWK POWER CORPORATION	
HUNTLEY STEAM STATION	
STATION SITE PLAN	
ENLARGED COMPOSITE OF	
STRUCTURES AND YARD PIPING	
SHEET NO. 16	
DES. DMS	DATE 12-28-77
APP.	SCALE 1" = 20'
INDEX	3-HO-M27
NO.	C-29599-W

NO.	DATE	BY	DESCRIPTION OF REVISION	CK.	APP.
1	1/26/85	T.M.	GENERAL REVISION		



NIAGARA RIVER

U.S. GOVERNMENT HARBOR LINE

EDGE OF BANK AS OF APRIL 1969 DWG. NO. C-28074-W 3-HI-M27

FENCE LINE C-28074-W, 3-HI-M27

SURVEY LINE 11966, 3-HI-M5

DRAINAGE COLLECTION SUMP #2 C-34733-W, 3-HO-M27

6" LEACHATE & RUNOFF DRAINS C-34733-W, 3-HO-M27

6" FORCE MAIN C-34733-W, 3-HO-M27

COAL PILE LIGHTING C-29524-W, 3-HO-S19.4 C-34776-W, 3-HO-S19.4

SURVEY LINE 11966 & 18835, 3-HI-M5

SLURRY TRENCH & BERM C-34516-W, 3-HO-M27

NORTH-SOUTH BASE LINE

WASTE WATER EQUALIZATION BASIN NO. 1 C-34733-W, 3-HO-M27

EQUALIZATION BASIN NO. 2 C-34733-W, 3-HO-M27

EQUALIZATION BASIN CONTROL STRUCTURE C-34733-W, 3-HO-M27

6" LEACHATE & RUNOFF DRAINS C-34733-W, 3-HO-M27

6" FORCE MAIN C-34733-W, 3-HO-M27

8" FORCE MAIN FROM COAL PILE COLLECTION SUMP C-34733-W, 3-HO-M27

AIR PREHEATER & BOILER FIRESIDE WASH FORCE MAIN C-34521-W, 3-HO-M27

4" EFFLUENT RETURN FROM TREATMENT PLANT WET WELL C-34733-W, 3-HO-M27

8" GRAVITY LINES C-34733-W, 3-HO-M27

SOUTH SLAG POND C-3821-W, C-32306-W 3-HO-M27

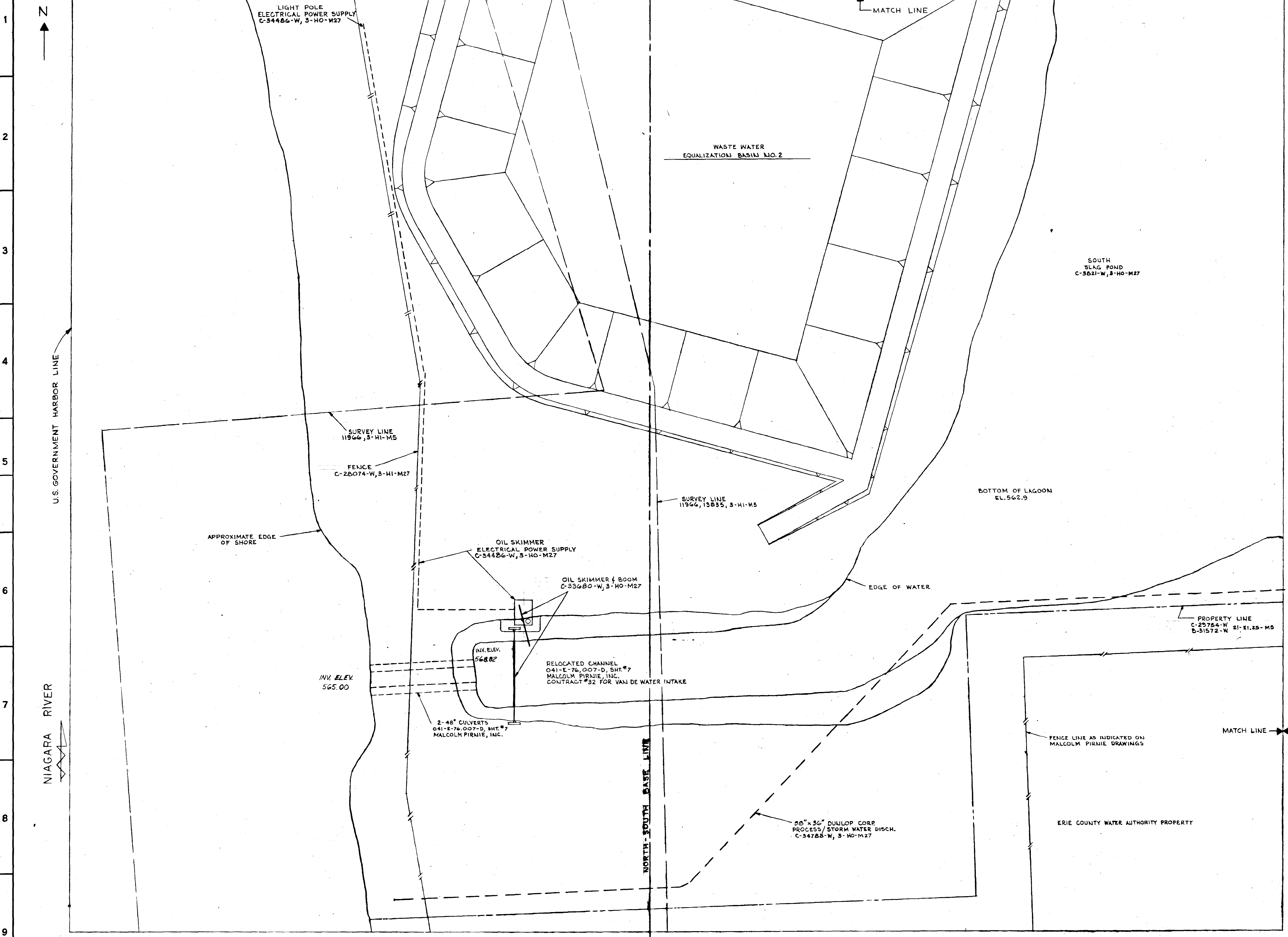
SHEET NO. 7

SHEET NO. 16

SHEET NO. 9

SEE SHEET NO. 1 FOR KEY PLAN AND NOTES.

NIAGARA MOHAWK RECORDS	
NIAGARA MOHAWK POWER CORPORATION	
HUNTLEY STEAM STATION	
STATION SITE PLAN	
ENLARGED COMPOSITE OF STRUCTURES AND YARD PIPING	
SHEET NO. 8	
DES. J.S.	DATE 12-30-77
APP. J.B.W.	SCALE 1" = 20'
APP. J.D. [Signature]	NO. 3-HO-M27
APP. [Signature]	NO. C-29599-W



SEE SHEET NO. 1 FOR KEY PLAN AND NOTES.

NIAGARA MOHAWK POWER CORPORATION	
HUNTLEY STEAM STATION	
STATION SITE PLAN	
ENLARGED COMPOSITE OF STRUCTURES AND YARD PIPING	
SHEET NO. 9	
DESIGNED BY: J.S.	DATE: 12-30-77
SCALE: 1" = 20'	INDEX: 3-HO-M27
NO. C-29599-W	