



Proactive by Design

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October 14, 2016
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Mr. Kevin Schroeder
Kevin.schroeder@nrgenergy.com
Huntley Power LLC
Tonawanda, NY 14150

Re: CCR Surface Impoundment Liner Design Criteria
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 settlement pond) at the Huntley Generating Station located in Tonawanda, New York (Site). This Liner Design Criteria statement 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 §257.71(a)(1)), owners/operators of existing CCR surface impoundments are required to document whether or not such a unit was constructed with any one of the following:

- (i) A liner consisting of a minimum of two feet of compacted soil with a hydraulic conductivity of no more than 1×10^{-7} cm/sec;
- (ii) A composite liner that meets the requirements of §257.70(b); or
- (iii) An alternative composite liner that meets the requirements of §257.70(c).

Based on the available design drawings for the south settlement pond (dated December 1977), and on the knowledge of the Huntley Plants Site Operations team, the existing surface impoundment was not known to be constructed with any specific liner system that meets the requirements of items (i) through (iii) identified above. As a result, and in accordance with §257.71(a)(3)(i), the existing Huntley south settlement pond is considered to be an existing unlined CCR surface impoundment.



PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of §257.71(a) and has visited and examined the Huntley Power’s South Settling Pond surface impoundment and available documentation. The undersigned registered professional engineer attests that the existing surface impoundment (identified as the Huntley Plant south settlement pond) does not meet the requirements of §257.71(a) and therefore is considered to be an unlined CCR surface impoundment. This certification was prepared as required by §257.71(b).

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