

**Fifth 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 fourth semiannual progress report (for the period ending July 31, 2021) 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 following confirmation of a Statistically Significant Level (SSL) in July 2020.

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) that has since been used to guide the BCP field investigation activities. 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. Accordingly, further details of the respective BCP and CCR remedies will be developed during the coming months, with formal remedy selection anticipated for the second half of 2022, and remedy implementation tentatively slated to commence in 2023. With regard to the CCR remedy, its selection will include the required pre-requisite public meeting/presentation [§257.96(e)], along with development of the required remedy evaluation/analysis document [§257.97(a)].

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, 2022 through July 31, 2022.