

**Seventh 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 seventh semiannual progress report (for the period ending January 31, 2023) 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.

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). 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.

These efforts resulted in submittal of a draft RI Report to the NYSDEC in early-May 2022, and submittal of a draft Alternatives Analysis Report & Remedial Action Work Plan (AAR/RAWP) on June 28, 2022. Within this latter document, various remedial options were presented, with identification of a proposed remedy for soils and groundwater, including a remediation strategy for the South Settling Pond that is responsive to the CCR Rule. NYSDEC's comments on the draft AAR/RAWP were received on November 29, 2022 and are currently being addressed, including required collection of some limited additional groundwater data. A revised AAR/RAWP will be submitted to the NYSDEC on or before April 16, 2023 per the current schedule obligations.

Following finalization and NYSDEC's documented acceptance of the revised AAR/RAWP, and a subsequent public comment period, a formal Public Meeting will be held to jointly present the components of the proposed remedy within the context of the BCP and CCR program frameworks. At present, it is anticipated that the Public Meeting [compliant with §257.96(e) of the CCR Rule] will take place before the end of Calendar Year 2023, with final remedy selection occurring either in late-2023 or early-2024.

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, 2023 through July 31, 2023.