

**Eighth 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 eighth semiannual progress report (for the period ending July 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. However, and despite lithium being measured above CCR groundwater protection standards, arsenic has remained the principal driver for future remediation activities at the site. In this regard, it is desired that the ultimate treatment technology selected will be dually effective for both of these CCR Appendix IV constituents.

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 were addressed during early-2023 through collection of additional arsenic groundwater data and performance of limited hydraulic conductivity on selected subsurface soils. These supplemental results, which were compiled into a revised RI Report and submitted to the NYSDEC on April 19, 2023, provided ample evidence that the proposed phytoremediation technology (as documented in the draft AAR/RAWP for managing arsenic in groundwater) would not be effective under the present site conditions. Following this submittal, subsequent additional comments were received from NYSDEC regarding arsenic remediation and the need for further characterization of the eastern berm soil materials prior to their potential use as on-site backfill during overall remedy implementation.

In response to these most recent comments, Huntley Power LLC has prepared a Bench Study Work Plan that is targeted for submission to the NYSDEC in early-August 2023. The work plan encompasses further characterization of the eastern berm soils and performance of a focused bench study to examine the potential effectiveness of various arsenic fixation technologies to address the groundwater. It is anticipated that initial bench tests could span over several months to determine potentially suitable treatment reagents, and then potentially followed by focused and more detailed evaluation of the most promising candidates, as necessary. Pilot-scale testing of the fixation technology may be a consideration, but that is not part of the currently outlined scope. Once completed, a summary report discussing the findings from the bench study and the eastern berm soils characterization efforts will be provided to the NYSDEC. Ultimately, a revised AAR/RAWP will be prepared at such time that confidence is reached on the application of an acceptable technology to treat the arsenic in groundwater.

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] could still take place in late-2023, with final remedy selection occurring most likely in early-2024 followed by the start of remedy implementation by mid-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 August 1, 2023 through January 31, 2024.