

**Third 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 and per the requirements of 40 CFR §257.97(a), this document represents the third semiannual progress report (for the period ending January 31, 2021) with regard to the ongoing CCR remedy selection process for the South Settling Pond at the Huntley Generating Station. As outlined in the ACM Report, 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 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) to provide an overview of the South Parcel (NYSDEC Site No. C915337), and to advertise a public comment period on the Remedial Investigation Work Plan (RIWP) that will guide the BCP field investigation activities. The final approved RIWP was issued in late-July 2020, with supporting field work and sampling performed during October-November 2020. Assimilation and validation of collected data is currently ongoing and once completed, this information and other relevant findings will factor into the development of a Remedial Investigation Report targeted for submittal to the NYSDEC in May 2021.

It is further acknowledged that the August 2019 ACM (conducted for arsenic) may be revisited to consider additional information generated to address the recently identified Statistically Significant Level (SSL) of lithium at the South Settling Pond. Notification of this SSL was provided to NYSDEC in early-July 2020. Ongoing activities (including review of BCP-derived data and information) will result in completion of the lithium-specific ACM in early-March 2021.

Concurrent with the above and as required, Huntley Power LLC will continue to conduct Assessment Monitoring events for the South Settling Pond. The next semiannual progress report will provide an update for the period covering February 1, 2021 through July 31, 2021, and will appropriately address the combined status of remedy selection for both arsenic and lithium.