

**Fourth Semiannual Progress Report – Selection of Remedy  
Huntley Generating Station—Huntley Power LLC  
South Settling Pond  
Tonawanda, New York**

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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) 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 performed during October-November 2020. Assimilation, reduction, and validation of collected field data was completed in April 2021, leading to the identification of data gaps and supplemental data needs, including activities to support further delineation of the South Settling Pond's physical limits. These supplemental data gathering efforts will be undertaken during the July-September 2021 timeframe, with anticipated submittal of a finalized Remedial Investigation Report, Alternatives Analysis Report, and Remedial Work Plan to the NYSDEC by the end of Calendar Year 2021. These reports will provide increased clarity on potential remedies being contemplated under the BCP, and offer opportunity for consideration of integrated/responsive remedies under the CCR framework.

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, 2021 through January 31, 2022.