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GZA GeoEnvironmental of NY
300 Pearl Street
Suite 700
Buffalo, NY 14202
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F: 716.248.1472
www.gza.com



October 17, 2018
File: 21.0056811.00

Mr. George Streit
George.Streit@nrg.com
Huntley Power LLC
3500 River Road
Tonawanda, NY 14150

Re: Existing CCR Surface Impoundment Location Restrictions – Placement Above the Uppermost Aquifer
Huntley Generating Station South Settling Pond
Tonawanda, New York

Dear Mr. Streit:

GZA GeoEnvironmental of New York (GZA) presents this location restriction documentation to Huntley Power LLC (Huntley) for the existing coal combustion residuals (CCR) surface impoundment located at the Huntley facility in Tonawanda, New York (Site). This location restriction documentation is required by the United States Environmental Protection Agencies (USEPAs) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, as presented in the Federal Register Volume 80 No 74 dated April 17, 2015. In accordance with the CCR Rule (40 CFR §257.60(a), owners/operators of a CCR unit must demonstrate that existing surface impoundments are constructed with a base no less than 1.52 meters (5.0 feet) above the upper limit of the uppermost aquifer, or must demonstrate that there will be not be an intermittent, reoccurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in the groundwater elevations (including the seasonal high water table).

Site Background

The CCR surface impoundment for the Site is identified as the South Settling Pond that was formerly used for discharge of plant-generated process water including CCR sluice water and non-CCR water associated from sump pumps, non-contact cooling water, storm water and other various sources. As of February 29, 2016, the facility eliminated discharge of the CCR sluice water and most of the non-CCR water into the South Pond; however, limited non-CCR water (i.e., stormwater sump collection) continues to be discharged. The outfall for the South Pond is identified as Outfall 008 and is regulated under the New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) permit #9-1464-00130/00003.

The limits of the South Settling Pond are shown on the attached Figure 1 – Site Plan.

The existing south settling pond bottom elevations reportedly vary from 563 to 565 ± feet, depending on location. Nearby CCR groundwater monitoring wells have been reported with groundwater elevations (collected October 2017) ranging from 566.5 and 568.7 feet. Thus,



the requirement for a minimum 5-foot separation between the bottom of the existing surface impoundment and the elevation of the uppermost aquifer is not compliant with the CCR rule.

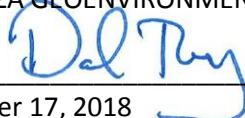
In accordance with §257.60(c)(4), "...if the owner or operator of an existing CCR surface impoundment fails to demonstrate compliance with the requirement for placement above the uppermost aquifer, the CCR unit will be subject to the requirements of 257.101(b)(1) which states that within six months of determining non-compliance with Location Restrictions (i.e., 257.60(a)), the owner or operator of the CCR surface impoundment must cease placing CCR and non-CCR waste streams into the CCR unit and close the CCR unit in accordance with 257.102".

Based on the determination that the Huntley Plant surface impoundment is non-compliant for the 5-foot placement above the uppermost aquifer, Huntley Power will evaluate actions necessary to terminate discharge of non-CCR water into the existing surface impoundment within the 6-month time (by April 12, 2019) as required by 257.101(b)(1). Upon termination of non-CCR waste stream discharges into the surface impoundment, NRG will initiate impoundment closure activities as required by 257.102. However, coordination with NYSDEC will be required to modify the existing facility SPDES permit (Outfall 008) from the impoundment and may require a time extension to complete surface impoundment closure.

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of *Location Restrictions – §257.60 Placement Above the Uppermost Aquifer*. The undersigned registered professional engineer attests that this CCR Location Restriction documentation has been prepared in accordance with good engineering practice, including consideration of applicable state regulatory requirements and meets the requirements of §257.60, and that this plan is adequate for NRG - Huntley Power. This certification was prepared as required by §257.60(b).

Name of Professional Engineer: Daniel J. Troy, P.E.
Company: GZA GEOENVIRONMENTAL OF NEW YORK

Signature: 
Date: October 17, 2018
PE Registration State: New York
PE Registration Number: 081139-1



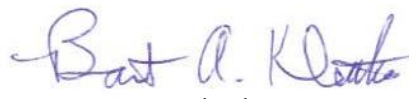
Professional Engineer Seal:

We trust this information satisfies your needs for this project.

Sincerely,

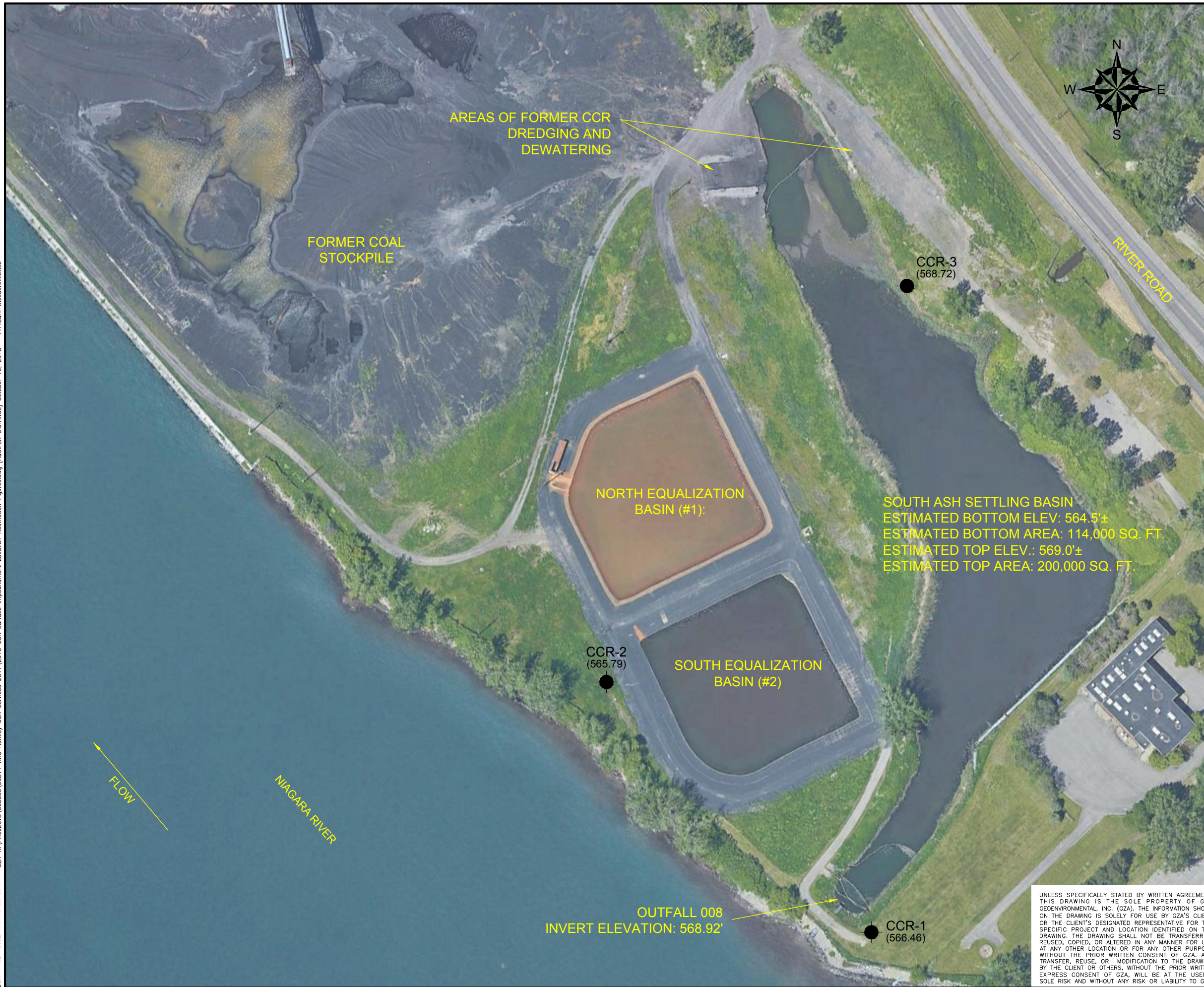
GZA GEOENVIRONMENTAL OF NEW YORK


Daniel J. Troy, P.E.
Senior Project Manager


Bart A. Klettke, P.E.
Principal

Attachments: Figure 1 - Site Plan

© 2017 - GZA GeoEnvironmental of NY, GZA-K:\PROJECTS\56600s\56611_NRG_Huntley_CCR_Surface Impoundment Location Restriction Figures.dwg [AQUIFER DISTANCE] October 16, 2018 - 11:48am thecodre.luttre



LEGEND

● CCR GROUNDWATER MONITORING WELL WITH GROUNDWATER ELEVATION MEASURED ON OCTOBER 5, 2017
CCR-1
 (566.46)

● **CCR-3**
 (568.72)

● **CCR-2**
 (565.79)

● **CCR-1**
 (566.46)

AREAS OF FORMER CCR DREDGING AND DEWATERING

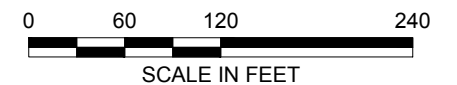
FORMER COAL STOCKPILE

NORTH EQUALIZATION BASIN (#1):

SOUTH ASH SETTLING BASIN
 ESTIMATED BOTTOM ELEV: 564.5'±
 ESTIMATED BOTTOM AREA: 114,000 SQ. FT.
 ESTIMATED TOP ELEV.: 569.0'±
 ESTIMATED TOP AREA: 200,000 SQ. FT.

SOUTH EQUALIZATION BASIN (#2)

OUTFALL 008
 INVERT ELEVATION: 568.92'



NO.	ISSUE/DESCRIPTION	BY	DATE

**2018 CCR SURFACE IMPOUNDMENT LOCATION RESTRICTION
 AQUIFER DISTANCE
 HUNTLEY POWER PLANT
 TONAWANDA, NEW YORK**

SOUTH SETTLEMENT POND

PREPARED BY: GZA GeoEnvironmental Inc. Engineers and Scientists 300 Pearl Street, Suite 700 BUFFALO, NEW YORK 14202 (716) 665-2300		PREPARED FOR: HUNTLEY POWER	
PROJ MGR: DJT	REVIEWED BY: BAK	CHECKED BY: DJT	FIGURE 1
DESIGNED BY:	DRAWN BY: TAK	SCALE: AS SHOWN	
DATE OCTOBER 2018	PROJECT NO. 21.0056811.00	REVISION NO.	

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October 17, 2018
File: 21.0056811.00

Mr. George Streit
George.Streit@nrg.com
Huntley Power LLC landfill
3500 River Road
Tonawanda, NY 14150

Re: Existing CCR Surface Impoundment Location Restrictions – Fault Zones and Seismic Impact Areas
Huntley Generating Station South Settling Pond
Tonawanda, New York

Dear Mr. Streit:

GZA GeoEnvironmental of New York (GZA) presents this location restriction documentation to Huntley Power LLC (Huntley) for the existing coal combustion residuals (CCR) surface impoundment located at the Huntley facility in Tonawanda, New York (Site). This location restriction documentation is required by the United States Environmental Protection Agencies (USEPAs) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, as presented in the Federal Register Volume 80 No. 74 dated April 17, 2015.

This documentation is being provided in accordance with the CCR Rule, 40 CFR §257.62 for fault areas and 257.63 for seismic impact zones. Specifically;

40 CFR §257.62 (a) states, "...existing surface impoundments must not be located within 60 meters (200 feet) of the outermost damage zone of a fault that has had displacement in Holocene time unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that an alternative setback distance of less than 60 meters (200 feet) will prevent damage to the structural integrity of the CCR unit, and

40 CFR §257.63 (a) states, "...existing surface impoundments must not be located in seismic impact zones time unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that all structural components including liners, leachate collection and removal systems, and surface water control systems, are designed to resist the maximum horizontal acceleration in lithified earth material for the Site.

Site Background

The CCR surface impoundment for the Site is identified as the South Settling Pond that was formerly used for discharge of plant-generated process water including CCR sluice water and non-CCR water associated from sump pumps, non-contact cooling water, storm water and other various sources. As of February 29, 2016, the facility eliminated discharge of the CCR sluice water and most of the non-CCR water into the South Pond; however, limited non-CCR water (i.e., stormwater sump collection) continues to be discharged. The outfall for the South



Pond is identified as Outfall 008 and is regulated under the New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) permit #9-1464-00130/00003.

The limits of the South Settling Pond are shown on the attached Figure 1 – Site Plan.


With respect to the location restriction for fault areas, there are no known Holocene faults present at the Site or within 200 feet of the site and therefore the surface impoundment is compliant with the Location Restrictions of 257.62(a).

With respect to the location restriction for seismic impact zones, 40 CFR 257.53 states that *...” a seismic impact zone is an area with a 2% or greater probability that the maximum expected horizontal acceleration, expressed as a percentage of the earth’s gravitational pull (g), will exceed 0.10 g in 50 years”*. Based on the United States Geological Survey’s 2014 Seismic map for the United States, the surface Impoundment is not considered to be located in an area of active seismic zone. Therefore, the surface impoundment is compliant with the Location Restrictions of 257.63(a).

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of *Location Restrictions §257.62 for Fault Zones and 257.63 for Seismic Impact Zones*. The undersigned registered professional engineer attests that this CCR Location Restriction documentation has been prepared in accordance with good engineering practice, including consideration of applicable state regulatory requirements and meets the requirements of §257.62 and §257.63, and that this plan is adequate for NRG - Huntley Power. This certification was prepared as required by §257.62(b) and §257.63(b).

Name of Professional Engineer: Daniel J. Troy, P.E.
 Company: GZA GEOENVIRONMENTAL OF NEW YORK


Signature: 
 Date: October 17, 2018
 PE Registration State: New York
 PE Registration Number: 081139-1
 Professional Engineer Seal:




We trust this information satisfies your needs for this project.

Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK


 Daniel J. Troy, P.E.
 Senior Project Manager


 Bart A. Klettke, P.E.
 Principal

Attachments: Figure 1 - Site Plan

© 2017 - GZA GeoEnvironmental of NY GZA-K:\PROJECTS\56800s\56811_NRG_Huntley_CCR_Surface Impoundment Location Restriction Figures.dwg [FAULT_ZONE SEISMIC IMPACT] October 16, 2018 11:49am theodore.ketlke



AREAS OF FORMER CCR
DREDGING AND
DEWATERING

FORMER COAL
STOCKPILE

NORTH EQUALIZATION
BASIN (#1):

SOUTH ASH SETTLING BASIN
ESTIMATED BOTTOM ELEV: 564.5'±
ESTIMATED BOTTOM AREA: 114,000 SQ. FT.
ESTIMATED TOP ELEV.: 569.0'±
ESTIMATED TOP AREA: 200,000 SQ. FT.

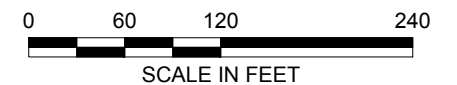
SOUTH EQUALIZATION
BASIN (#2)

OUTFALL 008
INVERT ELEVATION: 568.92'

FLOW

NIAGARA RIVER

RIVER ROAD



NO.	ISSUE/DESCRIPTION	BY	DATE

**2018 CCR SURFACE IMPOUNDMENT LOCATION RESTRICTION
FAULT ZONE & SEISMIC IMPACT
HUNTLEY POWER PLANT
TONAWANDA, NEW YORK**

SOUTH SETTLEMENT POND

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PREPARED BY: GZA GeoEnvironmental Inc. Engineers and Scientists 300 Pearl Street, Suite 700 BUFFALO, NEW YORK 14202 (716) 685-2300	PREPARED FOR: HUNTLEY POWER		
PROJ MGR: DJT	REVIEWED BY: BAK	CHECKED BY: DJT	FIGURE 1
DESIGNED BY:	DRAWN BY: TAK	SCALE: AS SHOWN	
DATE OCTOBER 2018	PROJECT NO. 21.0056811.00	REVISION NO.	



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October 17, 2018
File: 21.0056811.00

Mr. George Streit
George.Streit@nrg.com
Huntley Power LLC
3500 River Road
Tonawanda, NY 14150

Re: Existing CCR Surface Impoundment Location Restrictions – Unstable Areas
Huntley Generating Station South Settling Pond
Tonawanda, New York

Dear Mr. Streit:

GZA GeoEnvironmental of New York (GZA) presents this location restriction documentation to Huntley Power LLC (Huntley) for the existing coal combustion residuals (CCR) surface impoundment located at the Huntley facility in Tonawanda, New York (Site). This location restriction documentation is required by the United States Environmental Protection Agencies (USEPAs) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, as presented in the Federal Register Volume 80 No. 74 dated April 17, 2015.

This documentation is being provided in accordance with the CCR Rule, 40 CFR §257.64 for unstable areas. Specifically;

40 CFR §257.64 (a) states, "...existing CCR surface impoundments must not be located in an unstable area unless the owner or operator demonstrates by the dates specified in paragraph (d) of this section that recognized and generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted.

Site Background

The CCR surface impoundment for the Site is identified as the South Settling Pond that was formerly used for discharge of plant-generated process water including CCR sluice water and non-CCR water associated from sump pumps, non-contact cooling water, storm water and other various sources. As of February 29, 2016, the facility eliminated discharge of the CCR sluice water and most of the non-CCR water into the South Pond; however, limited non-CCR water (i.e., stormwater sump collection) continues to be discharged. The outfall for the South Pond is identified as Outfall 008 and is regulated under the New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) permit #9-1464-00130/00003.

The limits of the South Settling Pond are shown on the attached Figure 1 – Site Plan.




With respect to the location restriction for unstable areas, there are no documented unstable areas (e.g., karst conditions) that may result in significant differential settling resulting from geologic/geomorphologic features and/or manmade features at the Site. Previously completed soil borings completed at the Site indicate an approximate 10-foot-thick coarse-grained fill material over finer grained lacustrine and glacial deposited silty clay soil with lesser amounts of coarse soil (e.g., sands and gravel) over shale bedrock (identified as Camillus Shale).

The CCR unit was constructed on generally flat ground surfaces and the outfall area embankment was designed and constructed with an approximate 18-inch thick grouted rip rap armor (18-inch thick boulder sized rock) over 12 inches of structural gravel and a woven fabric. The CCR unit was designed and constructed with recognized and generally accepted good engineering practices that were incorporated into the design and construction of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disturbed. To date, there has been no evidence or indication of significant shifting, settling or general instability associated with the surface impoundment and associated embankment.

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of *Location Restrictions §257.64 for Unstable Areas*. The undersigned registered professional engineer attests that this CCR Location Restriction documentation has been prepared in accordance with good engineering practice, including consideration of applicable state regulatory requirements and meets the requirements of §257.64, and that this plan is adequate for NRG - Huntley Power. This certification was prepared as required by §257.64(b).

Name of Professional Engineer: Daniel J. Troy, P.E.
Company: GZA GEOENVIRONMENTAL OF NEW YORK

Signature: 

Date: October 17, 2018
PE Registration State: New York
PE Registration Number: 081139-1
Professional Engineer Seal:

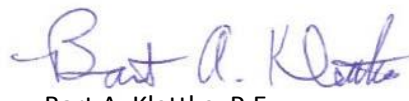


We trust this information satisfies your needs for this project.

Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK


Daniel J. Troy, P.E.
Senior Project Manager


Bart A. Klettke, P.E.
Principal

Attachments: Figure 1 - Site Plan

© 2017 - GZA GeoEnvironmental of NY, GZA-K:\PROJECTS\56800s\56811_NRG_Huntley_CCR_Surface Impoundment Location Restriction Figures.dwg [UNSTABLE AREAS] October 16, 2018 - 11:49am theodore.kittelle



AREAS OF FORMER CCR
DREDGING AND
DEWATERING

FORMER COAL
STOCKPILE

NORTH EQUALIZATION
BASIN (#1):

SOUTH ASH SETTLING BASIN
ESTIMATED BOTTOM ELEV: 564.5'±
ESTIMATED BOTTOM AREA: 114,000 SQ. FT.
ESTIMATED TOP ELEV.: 569.0'±
ESTIMATED TOP AREA: 200,000 SQ. FT.

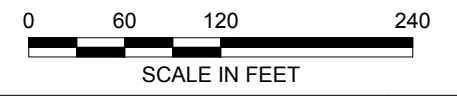
SOUTH EQUALIZATION
BASIN (#2)

OUTFALL 008
INVERT ELEVATION: 568.92'

FLOW

NIAGARA RIVER

RIVER ROAD



NO.	ISSUE/DESCRIPTION	BY	DATE

**2018 CCR SURFACE IMPOUNDMENT LOCATION RESTRICTION
UNSTABLE AREAS
HUNTLEY POWER PLANT
TONAWANDA, NEW YORK**

SOUTH SETTLEMENT POND

UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.

PREPARED BY: GZA GeoEnvironmental Inc. Engineers and Scientists <small>300 Pearl Street, Suite 700 Buffalo, New York 14202 (716) 685-2300</small>		PREPARED FOR: HUNTLEY POWER	
PROJ MGR: DJT	REVIEWED BY: BAK	CHECKED BY: DJT	FIGURE 1
DESIGNED BY:	DRAWN BY: TAK	SCALE: AS SHOWN	
DATE OCTOBER 2018	PROJECT NO. 21.0056811.00	REVISION NO.	



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October 17, 2018
File: 21.0056811.00

Mr. George Streit
George.Streit@nrg.com
Huntley Power LLC
3500 River Road
Tonawanda, NY 14150

Re: Existing CCR Surface Impoundment Location Restrictions - Wetlands
Huntley Generating Station South Settling Pond
Tonawanda, New York

Dear Mr. Streit:

GZA GeoEnvironmental of New York (GZA) presents this location restriction documentation to Huntley Power LLC (Huntley) for the existing coal combustion residuals (CCR) surface impoundment located at the Huntley facility in Tonawanda, New York (Site). This location restriction documentation is required by the United States Environmental Protection Agencies (USEPAs) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals from Electric Utilities; Final Rule, as presented in the Federal Register Volume 80 No 74 dated April 17, 2015. In accordance with the CCR Rule (40 CFR §257.61(a), "...existing surface impoundments are not to be located in wetlands, as defined in 232.2 if this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraphs (a) (1) through (5) of this section.

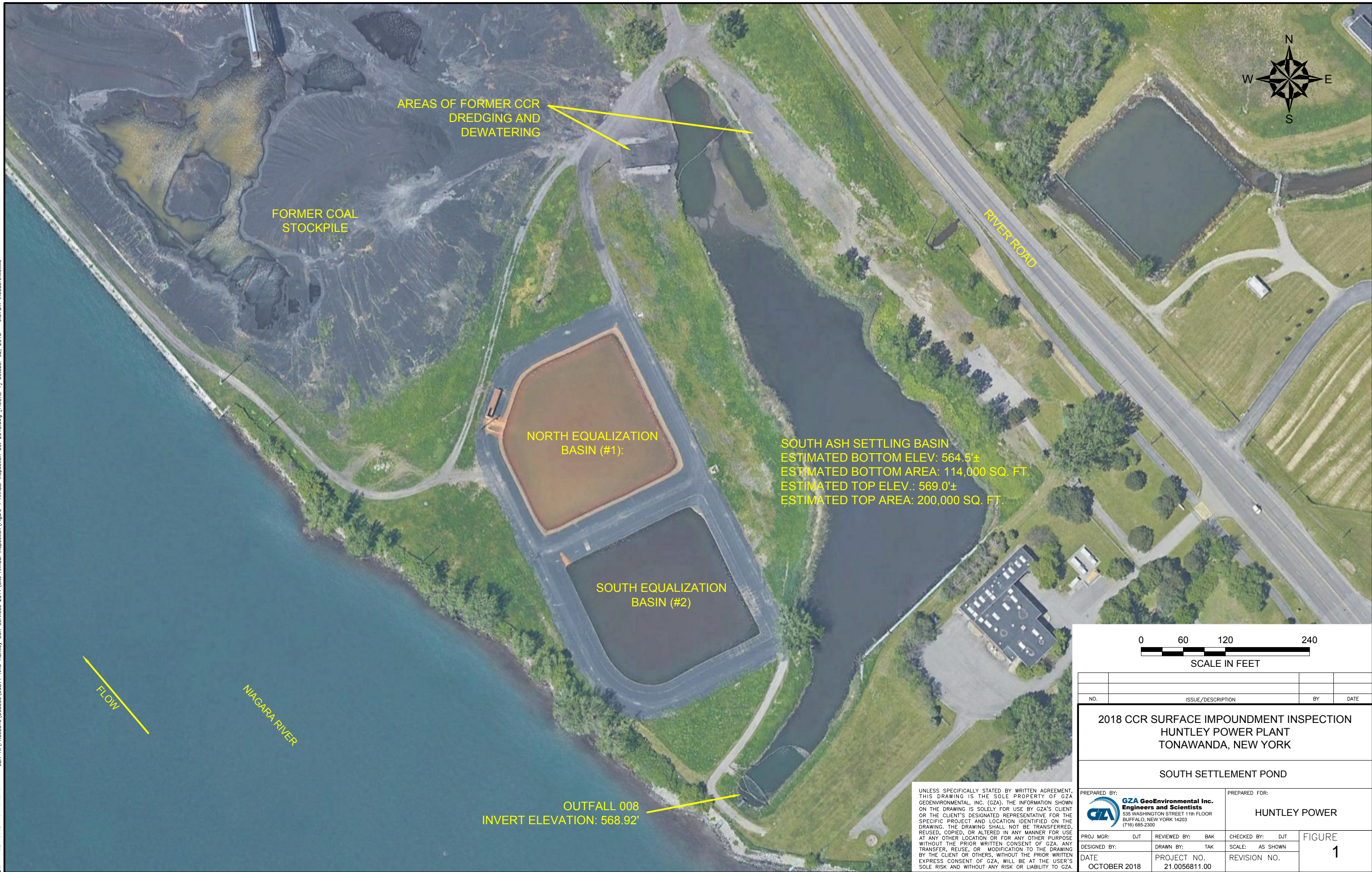
Site Background

The CCR surface impoundment for the Site is identified as the South Settling Pond that was formerly used for discharge of plant generated process water including CCR sluice water and non-CCR water associated from sump pumps, non-contact cooling water, storm water and other various sources. As of February 29, 2016, the facility eliminated discharge of the CCR sluice water and most of the non-CCR water into the South Pond; however, limited non-CCR water (i.e., stormwater sump collection) continues to be discharged. The outfall for the South Pond is identified as Outfall 008 and is regulated under the New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) permit #9-1464-00130/00003.

The limits of the South Settling Pond are shown on the attached Figure 1 – Site Plan.

A review of State and Federal wetland maps has determined that the existing south settling pond is **not** located within wetlands and therefore the surface impoundment is compliant with the Location Restrictions of 257.61(a).

©2017 - GZA GeoEnvironmental of NY GZA-K:\PROJECTS\56811_NRG_Huntley_CCR_Services_2017\Site Annual Inspection\Figure 1 Annual Inspection_Oct_2018.dwg [FIGURE 1] October 02, 2018 -- 9:37am theodore.luthe



AREAS OF FORMER CCR
DREDGING AND
DEWATERING

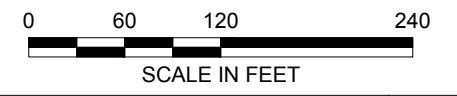
FORMER COAL
STOCKPILE

NORTH EQUALIZATION
BASIN (#1):

SOUTH ASH SETTLING BASIN
ESTIMATED BOTTOM ELEV: 564.5'±
ESTIMATED BOTTOM AREA: 114,000 SQ. FT.
ESTIMATED TOP ELEV.: 569.0'±
ESTIMATED TOP AREA: 200,000 SQ. FT.

SOUTH EQUALIZATION
BASIN (#2)

OUTFALL 008
INVERT ELEVATION: 568.92'



NO.	ISSUE/DESCRIPTION	BY	DATE

**2018 CCR SURFACE IMPOUNDMENT INSPECTION
HUNTLEY POWER PLANT
TONAWANDA, NEW YORK**

SOUTH SETTLEMENT POND

PREPARED BY: GZA GeoEnvironmental Inc. Engineers and Scientists <small>535 WASHINGTON STREET 11th FLOOR BUFFALO, NEW YORK 14203 (716) 685-2300</small>		PREPARED FOR: HUNTLEY POWER	
PROJ MGR: DJT	REVIEWED BY: BAK	CHECKED BY: DJT	FIGURE 1
DESIGNED BY:	DRAWN BY: TAK	SCALE: AS SHOWN	
DATE OCTOBER 2018	PROJECT NO. 21.0056811.00	REVISION NO.	

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