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December 6, 2019
File: 21.0056811.00

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

Re: 2019 Annual CCR Fugitive Dust Control Report
Huntley Generating Station
Tonawanda, New York

Dear Mr. Streit:

GZA GeoEnvironmental of New York (GZA) presents this 2019 Annual Fugitive Dust Control Report to Huntley Power LLC (Huntley) for the existing generating plant in Tonawanda, New York and the plant's associated coal combustion residuals (CCR) landfill, located north of the Site on River Road (Site). This annual report is required by the United States Environmental Protection Agency's (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 §257.80(c), the station must prepare an annual fugitive dust control report that includes the following information:

- A description of actions taken to control CCR fugitive dust
- A record of all citizen complaints
- A summary of any corrective actions taken

A Fugitive Dust Control Plan for the CCR units, including plant areas and surface impoundments and landfills associated with NRG's Huntley Generating Station was prepared on October 13, 2015. This plan was created in accordance with 40 CFR 257.80(b) and identifies measures to be taken by the facility to control/minimize CCR from becoming airborne at the facility. We note that the power plant has been shut down and is no longer in operation and therefore the Site no longer generates CCR waste.

Actions Taken: Since October 2015, the facility operations have been done in accordance with the requirements of the CCR Fugitive Dust Control Plan. Standard operations at the CCR landfill utilize a temporary vegetative cover over inactive areas to reduce the potential for generation of fugitive dust and for erosion control at the upper portions of the landfill (i.e., inactive Cells A, C and D). Additionally, the access roads within the plant and landfill areas were routinely watered on dry days to reduce potential for dust generation resulting from vehicular traffic. We note that activities at the landfill have primarily been limited to routine O & M activities (e.g., grass mowing, groundwater sampling, etc.). Additionally, the remaining open/active portions of Cells A, C and D were recently regraded and covered with a temporary vegetated soil cover to reduce the potential for fugitive dust migration.

Citizen Complaints: No citizen complaints were reported to either Huntley Power or the New York State Department of Environmental Conservation (NYSDEC) since issuance of the previous Fugitive Dust Control Plan in December 2018.

Corrective Action Summary: Because the facility routinely controlled the work areas from generation of airborne dust by wetting methods and the covering of exposed impoundment CCR, and due to no citizen complaints of fugitive dust, corrective actions were not required to be made at the Site since the previously issued Fugitive Dust Control Report of December 2018.

PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of §257.80(c) Annual CCR Fugitive Dust Control Report Requirements. The undersigned registered professional engineer attests that this annual report has been prepared in accordance with good engineering practice, including consideration of applicable state regulatory requirements and meets the requirements of §257.80(c), and that this plan is adequate for NRG - Huntley Power. This certification was prepared as required by §257.80(c).

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

Signature: _____
Date: December 6, 2019
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