

January 15, 2016  
File: 21.0056757.01

Mr. Kevin Schroeder  
[Kevin.schroeder@nrgenergy.com](mailto:Kevin.schroeder@nrgenergy.com)  
Huntley Power LLC  
Tonawanda, NY 14150



Re: CCR Surface Impoundment Annual Inspection Report  
Huntley Generating Station  
Tonawanda, New York

Dear Mr. Schroeder:

535 Washington Street  
11<sup>th</sup> Floor  
Buffalo, New York  
14203  
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Fax: 716-685-3629  
[www.gza.com](http://www.gza.com)

GZA GeoEnvironmental of New York (GZA) presents this Annual Inspection report to Huntley Power LLC (Huntley) for the existing coal combustion residuals (CCR) surface impoundment at the Huntley Generating Station located in Tonawanda, New York (Site). This annual inspection is required by the United States Environmental Protection Agencies (USEPA) 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 257.83), owners/operators of CCR surface impoundments are required to be inspected on a periodic basis by a qualified professional engineer to ensure the design, construction, operation and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards.

The required periodic inspections presented in the CCR Rule are intended for an existing surface impoundment at the Site identified as the South Settling Pond. We note that three ash settling ponds historically located in the northern portion of the Site were removed from service (i.e., drained, regraded and seeded) in 2015 and therefore are not included in this annual inspection. Additionally, two asphalt lined containment basins (identified as North and South Equalization Basins) located in the southern portion of the Site do not receive CCR wastes and therefore are not included as part of the annual inspection. The limits of the South Settling Pond are shown on the attached figure.

#### *Site Observations*

GZA visited the Huntley Power Plant to make observations of the South Settling Pond on October 2, 2015. The following discussion addresses the requirements for the annual inspection report by a qualified professional engineer as indicated by the CCR Rule section 257.83 (b)(2) (i) through (vii).

- (i) This annual inspection is the first one as required by the newly issued CCR Rule and subsequently would preclude discussion of observational changes from the previous annual CCR inspections. However, based on our knowledge of the



- Site, GZA has not observed any notable changes in the ponds geometry within the past year.
- (ii) During our 2015 South Settling Pond observations, no instrumentation equipment was observed within the impoundment. The Huntley Plant indicated installation of surface water measurement equipment was planned to be installed to allow for future measurements to be made.
  - (iii) Because there was no measurement gauge or associated instrumentation and because this is the first annual CCR inspection, the minimum, maximum and present depth and elevation of both surface water and CCR was not available. We note that recent work completed within the area identified a mostly constant water elevation (el.) of 570± with an estimated maximum water level el. 575± and a reported el.563± for the bottom of pond.
  - (iv) Based on previous studies completed at the Site, an approximate storage capacity of 42.7 acre-feet has been determined for the South Settling Pond.
  - (v) The facility routinely dredges accumulated CCR from the northern portion of the South Settling Pond. The recovered CCR is stockpiled adjacent to the pond to drain free liquids prior to final disposal at the facility landfill. This process essentially results in a negligible net gain of CCR within the South Settling Pond.
  - (vi) During the time of our Site observations, no indication of actual or potential structural weaknesses of the surface water impoundment were observed that would be considered disruptive or having the potential to disrupt the operation and safety of the CCR unit.
  - (vii) This annual inspection is the first one required by the newly issued CCR Rule and would preclude comparison discussion of previous annual CCR inspections. However, based on our knowledge of the Site, we have not identified any changes that may affect the stability or operation on the impoundment structure within the past year.

Overall, the South Settling Pond, the only remaining surface impoundment located at the Huntley Power Plant was observed to be constructed, operated and maintained in general accordance with the proposed design configurations, and the side slopes and other areas were observed in good condition with no evidence of actual or potential structural instability.

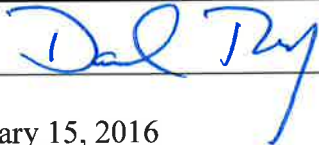
PROFESSIONAL ENGINEER CERTIFICATION

The undersigned registered professional engineer is familiar with the requirements of §257.83 and has visited and examined the Huntley Station South Settling Pond surface impoundment or has supervised examination of the facilities by appropriately qualified personnel. The undersigned registered professional engineer attests that this Annual Inspection Report has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and meets the requirements of §257.83, and that this Report is adequate for the Huntley Station. This certification was prepared as required by §257.83(b)(2).



Name of Professional Engineer: **Daniel J. Troy, P.E.**

Company: **GZA GEOENVIRONMENTAL OF NEW YORK**

Signature: 

Date: January 15, 2016

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.  
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Attachments: Figure – Huntley Power South Settling Pond

©2016 - GZA GeoEnvironmental of NY GZA-K:\PROJECTS\66700s\66757.01 Dunkirk Power LLC CCR Certification\Annual Inspection Surface Impoundments\Figure 1 Annual Inspection.dwg [FIGURE 1] January 15, 2016 - 9:53am michael.wress



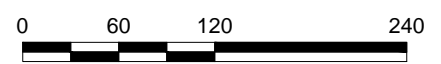
AREAS OF  
CCR DREDGING  
AND DEWATERING

NORTH EQUALIZATION  
BASIN (#1):

SOUTH EQUALIZATION  
BASIN (#2)

SOUTH ASH SETTLING BASIN  
ESTIMATED BOTTOM ELEV.: 563'±  
ESTIMATED BOTTOM AREA: 114,000 SQ. FT.  
ESTIMATED TOP ELEV.: 575'  
ESTIMATED TOP AREA: 200,000 SQ. FT.

NIAGARA RIVER  
FLOW



NO.	ISSUE/DESCRIPTION	BY	DATE

**ANNUAL SURFACE IMPOUNDMENT INSPECTION  
HUNTLEY POWER PLANT  
TONAWANDA, NEW YORK**

**SOUTH SETTLEMENT POND**

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PREPARED BY: <b>GZA GeoEnvironmental Inc.</b> Engineers and Scientists 535 WASHINGTON STREET 11th FLOOR BUFFALO, NEW YORK 14203 (716) 855-2300	PREPARED FOR: <b>HUNTLEY POWER</b>		
PROJ MGR: BAK	REVIEWED BY: BAK	CHECKED BY: DJT	<b>FIGURE 1</b>
DESIGNED BY:	DRAWN BY: MDK	SCALE: AS SHOWN	
DATE JANUARY 2016	PROJECT NO. 21.0056757.01	REVISION NO.	