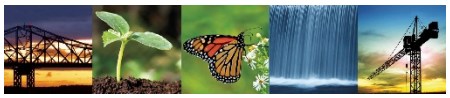

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www.gza.com

VIA EMAIL

August 9, 2023
File No. 21.0056855.20

Mr. Benjamin McPherson, P.E.
New York State Department of Environmental Conservation (NYSDEC)
Division of Environmental Remediation
700 Delaware Avenue
Buffalo, New York 14209
via email: benjamin.mcpherson@dec.ny.gov

Re: Huntley Power South Parcel
Proposed Remedial Bench Study Work Plan
Brownfield Cleanup Program Site Number C915337 (Site)
Tonawanda, New York

Mr. McPherson:

GZA GeoEnvironmental of New York (GZA), on behalf of Huntley Power, LLC (Huntley) submits this proposed scope of work for a remedial bench study. Phytoremediation was initially proposed to address arsenic in Site groundwater. Analytical results, groundwater quality data, and hydraulic conductivity testing conducted in winter 2023 (submitted under separate cover[1]) suggested conditions were not conducive for phytoremediation. Arsenic was detected in the groundwater analyzed from five of the eight monitoring wells (CCR-2, -3, -7, -8 and -10) sampled during the event and was primarily in the dissolved state in four of those wells (CCR-2, -3, -7, and -8). In addition, hydraulic conductivity testing indicated the soils are highly conductive, which reduces the potential for suitable results from phytoremediation.

Additionally, NYSDEC indicated further characterization of the eastern soil berms is required prior to their usage as backfill, as proposed in the draft Remedial Action Work Plan (RAWP).

The two objectives of this proposed work plan are:

1. to conduct a preliminary evaluation of a chemical fixation remedy for preventing arsenic in Site groundwater; and,

2. to further characterize the eastern soil berms to determine appropriate potential uses as backfill during Site remedy implementation.

Task 1: Material Sampling and Arsenic Fixation Bench Study

GZA and Huntley's environmental subcontractor, Sevenson Environmental (Sevenson), will conduct test pit excavations to collect sufficient volumes of soil material to conduct an arsenic fixation bench study. Test pit locations will be proximate to the monitoring wells of

[1] Revised Remedial Investigation Report, Huntley Power South Parcel, Tonawanda, New York, NYSDEC BCP Site Number C915337 and dated April 19, 2023

concern/equalization basins and at depths where arsenic concentrations were identified exceeding commercial use threshold values during the Remedial Investigation (RI). GZA notes the protection of groundwater soil cleanup objective (SCO) is applicable at the Site. Material will be collected from approximately four test pits completed proximate to the equalization basins (**Figures 5A through 5D**). Representative composite samples of the unsaturated material will be collected in two-foot intervals to an approximate depth of 10 feet below ground surface (bgs), resulting in an anticipated five, 5-gallon containers. Representative composite samples of the saturated soil material will be collected in five-foot intervals from approximately 10 to 20 feet bgs, resulting in an anticipated two, 5-gallon containers. Each container will be filled with a composite of representative material from the specific two to fivefoot sections (i.e. 0-2 ft bgs, 2-4 ft bgs, …10-15, 15-20 ft bgs) up to a depth of 20 feet bgs from the four test pit locations. GZA will also collect companion duplicate samples for on-site archiving, in case additional material is required for analysis or testing purposes. Bulk samples will be concurrently collected from the same horizons and sampling frequencies and submitted for analysis for arsenic for comparative purposes. Additionally, GZA will collect and submit groundwater from the monitoring wells of concern, should the remedial vendor request such to evaluate the additive/remedy.

GZA will submit the samples and other available site characterization information such as the Remedial Investigation Report and annual groundwater elevation information gathered under this program to up to three appropriate remedial vendors to conduct a site-specific arsenic fixation laboratory bench study using that vendor's product, method and/or process. The remedial vendor(s) will test the efficacy of their product/process on fixating dissolved arsenic and preventing leaching of arsenic to groundwater using the provided samples. The remedial vendor(s) will evaluate arsenic fixating products/processes and make recommendations on how to apply their product/process to reduce arsenic levels in groundwater. The vendor(s) will also evaluate potential unintended consequences or impacts of the use of their product or process in this application. If the results of the bench study are favorable, GZA will select a preferred vendor and continue to work with the remedial vendor to design a work plan for implementation of an arsenic remedy, to be incorporated into the Remedial Action Work Plan, for submittal to NYSDEC.

Task 2: Eastern Berm Characterization

As requested by NYSDEC, the eastern berms require further characterization to evaluate for potential use as backfill during Site remedy implementation. GZA proposes to conduct five test pits within the berms to depths of approximately six feet (anticipated depth of berm bottom). Vertically composited samples will be collected from each test pit and analyzed for previously established Remedial Investigation[2] "Focused List" parameters: semi-volatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs). As arsenic is the primary contaminant of concern, GZA proposes this limited list of parameters for initial screening/characterization of the berm material. Based on the estimated volume of over 12,000 cubic yards, this initial screening will be used to determine if, and how the material can be reused on site. After this initial assessment, additional analysis may be required depending on the determined disposition of the material.

Task 3: Reporting

GZA will provide a letter report summarizing the work conducted and will include supplementary figures, tables, and collected data. Information obtained by this assessment is anticipated to further inform a site remedy and will also be incorporated into the revised RAWP.

[2] Remedial Investigation Work Plan, Huntley Power South Parcel Site (C915337), 3500 River Road, Town of Tonawanda, New York 14150 and dated July 29, 2020 (Focused List parameters indicated on page 11).

Schedule

This scope of field work is anticipated to take two field days. Work will be scheduled promptly following NYSDEC approval. NYSDEC will be appraised of that schedule a minimum of three days prior to mobilization. The initial bench laboratory study by the potential remedial vendor is anticipated to take four to six weeks to complete. Results will be provided to NYSDEC following report completion and internal review.

Thank you for your time and consideration. If you have any questions or require additional information, please contact Thomas Bohlen at (716) 570-5983.

Sincerely,

GZA GEOENVIRONMENTAL OF NEW YORK

Thomas Bohlen, P.G.
Project Manager

Daniel J. Troy, P.E.
Consultant Reviewer

Bart A. Klettke, P.E.
Principal

Cc: Steven Berninger (NYSDOH)
Gregory Brown (Brown Duke & Fogel, P.C.)
Tony Shea (Huntley Power LLC)
Michael Sommer (Huntley Power LLC)
George Streit (Huntley Power LLC)

Attachments: Figures 5A through 5D – Proposed Test Pit Locations/Elevated Arsenic Locations in Soil from Remedial Investigation

LEGEND

- SAMPLE POINT WITH ARSENIC BELOW COMMERCIAL USE SCO (16 MG/KG) IN 0'-5'
- SAMPLE POINT WITH ELEVATED ARSENIC GREATER THAN COMMERCIAL USE SCO (16 MG/KG) IN 0'-5' BGS INTERVAL
- SUPPLEMENTAL RI PROPOSED TEST PIT LOCATION
- SLURRY WALL
- BCP SITE BOUNDARY
- APPROXIMATE EASEMENT OF FORMER ERIE CANAL

SOURCE

1) THIS MAP CONTAINS THE ESRI ARCGIS ONLINE BING MAPS AERIAL LAYER PACKAGE, PUBLISHED NOVEMBER 25, 2013 BY ESRI ARCIMS SERVICES AND UPDATED MONTHLY. THIS SERVICE USES UNIFORM NATIONALLY RECOGNIZED DATUM AND CARTOGRAPHY STANDARDS AND A VARIETY OF AVAILABLE SOURCES FROM SEVERAL DATA PROVIDERS.
2) THE BASE MAP FEATURES WERE LOCATED FROM A "PRELIMINARY" UNTITLED ELECTRONIC CAD FILE PREPARED BY WENDEL COMPANIES, RECEIVED VIA EMAIL ON 07-01-2018, FILE: 419418-BOUNDARY.DWG, AND FROM A PDF PREPARED BY WENDELL COMPANIES ENTITLED "180816 HUNTLEY BCP PARCEL - SIGNED.PDF", DATED: 06-04-2018, ORIGINAL SCALE: 1" = 100 FEET, PROJECT NUMBER: 419418.
3) THE HISTORICAL UTILITY DATA WAS REFERENCED FROM ELECTRONIC FILES PROVIDED BY HUNTLEY POWER LLC,, RECEIVED VIA EMAIL ON 09-06-2019, FILES: 34735SH01.CIT, 34736SH02.CIT, 34737SH03.CIT, 34738SH04.CIT, 34739SH05.CIT, 34740SH06.CIT,34741SH07.CIT, 34742SH08.CIT AND FROM A PDF PREPARED BY NIAGRA MOHAWK POWER CORPORATION ENTITLED "STATION SITE PLAN, ENLARGED COMPOSITE OF STRUCTURES, AND YARD PIPING" DATED: 03-23-1977, ORIGINAL SCALE: 1" = 20 FEET.
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5) LOCATIONS OF MONITORING WELLS WERE REFERENCED FROM MONITORING WELL AS-BUILTS SURVEYED BY WENDEL ON NOVEMBER 18TH 2020. ALL OTHER SITE FEATURES ARE APPROXIMATE PENDING RECIEPT OF FINAL AS-BUILTS.

HUNTLEY POWER SOUTH PARCEL
3500 RIVER ROAD
TONAWANDA, NEW YORK

Occurance Of Elevated Arsenic Locations In 0-5 ft Below Ground Surface Interval

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com		PREPARED FOR: NRG HUNTLEY POWER, LLC	
PROJ MGR: JJR	REVIEWED BY: DJT	CHECKED BY: BK	FIGURE 5A
DESIGNED BY: JJR	DRAWN BY: EMD / SMW	SCALE: 1 " = 150 FEET	
DATE: 08/03/2023	PROJECT NO. 21.0056855.00	REVISION NO.	

LEGEND

- SAMPLE POINT WITH ARSENIC BELOW COMMERCIAL USE SCO (16 MG/KG) IN 5'-10' BGS INTERVAL
- SAMPLE POINT WITH ELEVATED ARSENIC GREATER THAN COMMERCIAL USE SCO (16 MG/KG) IN 5'-10' BGS INTERVAL
- SUPPLEMENTAL RI PROPOSED TEST PIT LOCATION
- SLURRY WALL
- BCP SITE BOUNDARY
- APPROXIMATE EASEMENT OF FORMER ERIE CANAL

SOURCE

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HUNTLEY POWER SOUTH PARCEL
3500 RIVER ROAD
TONAWANDA, NEW YORK

Occurance Of Elevated Arsenic Locations In 5-10 ft Below Ground Surface Interval

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com		PREPARED FOR: NRG HUNTLEY POWER, LLC	
PROJ MGR: JJR	REVIEWED BY: DJT	CHECKED BY: BK	FIGURE 5B
DESIGNED BY: JJR	DRAWN BY: EMD / SMW	SCALE: 1 " = 150 FEET	
DATE: 08/03/2023	PROJECT NO. 21.0056855.00	REVISION NO.	

LEGEND

- SAMPLE POINT WITH ARSENIC BELOW COMMERCIAL USE SCO (16 MG/KG) IN 10'-15' BGS INTERVAL
- SAMPLE POINT WITH ELEVATED ARSENIC GREATER THAN COMMERCIAL USE SCO (16 MG/KG) IN 10'-15' BGS INTERVAL
- SLURRY WALL
- BCP SITE BOUNDARY
- APPROXIMATE EASEMENT OF FORMER ERIE CANAL

SOURCE

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HUNTLEY POWER SOUTH PARCEL
3500 RIVER ROAD
TONAWANDA, NEW YORK

Occurance Of Elevated Arsenic Locations In 10-15 ft Below Ground Surface Interval

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com		PREPARED FOR: NRG HUNTLEY POWER, LLC	
PROJ MGR: JJR	REVIEWED BY: DJT	CHECKED BY: BK	FIGURE 5C
DESIGNED BY: JJR	DRAWN BY: EMD / SMW	SCALE: 1 " = 150 FEET	
DATE: 08/03/2023	PROJECT NO. 21.0056855.00	REVISION NO.	

RIVER ROAD

TP-11
SOIL BERM
TP-13
FOOTPRINT OF FORMER ERIE CANAL
SOIL BERM
TP-14
TP-16
DRAINAGE SUMP
SOUTH SETTLING POND
TP-21
CCR-7
CCR-8
MW-10D
TP-3
MW-8S
SP-2
MW-7S
SP-5
DRAINAGE SUMP
EQUALIZATION BASIN #1
SP-4
EQUALIZATION BASIN #2
FORMER COAL PILE
MW-4D
TP-8
SP-3
CCR-2
MW-6D
MW-5D
DRAINAGE SUMP
DRAINAGE SUMP
MW-9S

NIAGARA RIVER

0 75 150 300
SCALE IN FEET

LEGEND

- SAMPLE POINT WITH ARSENIC BELOW COMMERCIAL USE SCO (16 MG/KG) IN >15' BGS
- SAMPLE POINT WITH ELEVATED ARSENIC GREATER THAN COMMERCIAL USE SCO (16 MG/KG) IN >15' BGS
- SLURRY WALL
- BCP SITE BOUNDARY
- APPROXIMATE EASEMENT OF FORMER ERIE CANAL

SOURCE

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HUNTLEY POWER SOUTH PARCEL
3500 RIVER ROAD
TONAWANDA, NEW YORK

Occurance Of Elevated Arsenic Locations In >15 ft Below Ground Surface Interval

PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com		PREPARED FOR: NRG HUNTLEY POWER, LLC	
PROJ MGR: JJR	REVIEWED BY: DJT	CHECKED BY: BK	FIGURE 5D
DESIGNED BY: JJR	DRAWN BY: EMD / SMW	SCALE: 1 " = 150 FEET	
DATE: 08/03/2023	PROJECT NO. 21.0056855.00	REVISION NO.	