

US EPA ARCHIVE DOCUMENT



Huntley Power LLC
3500 River Road
Tonawanda, NY 14150

April 15, 2013

Mr. Stephen Hoffman
US Environmental Protection Agency
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Arlington, VA 22202-2733

Delivered via e-mail to: hoffman.stephen@epa.gov ,
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RE: Response to the Report of Dam Safety Assessment of Coal Combustion Surface Impoundments – NRG Energy, Huntley Electric Generating Station, Tonawanda, NY

Dear Mr. Hoffman:

In regards to the e-mail request sent to Carson Leikam from Jana Englander, from the US EPA on March 14, 2013, NRG Energy, Inc. (NRG) is providing the following response to the recommendations on the “Report of Dam Safety Assessment of Coal Combustion Surface Impoundments – NRG Energy, Huntley Electric Generating Station, Tonawanda, NY” (Report).

South Ash Settling Pond, North Pond 2, and North Pond 3 (Geotechnical Study)

In response to the recommendations of AMEC Earth & Environmental, Inc. (AMEC) regarding the geotechnical study, NRG will evaluate the requirements for performing geotechnical studies to confirm the strength parameters used in the stability analyses, including both borings and a piezometer at each pond. NRG will amend this response with its plan to address this recommendation by June 1, 2013.

South Ash Settling Pond, North Pond 2, and North Pond 3 (Mowing, Emergency Action Plan, and Inspections)

In response to the recommendations of AMEC regarding mowing, as long as each pond is considered to be a Coal Combustion Waste (CCW) impoundment, NRG agrees to annually mow the embankment areas of each pond, beginning in 2013, and will undertake additional mowing if necessary to permit appropriate embankment inspections. NRG will conduct and document weekly impoundment inspections using an inspection checklist by facility operations and maintenance personnel, beginning the week of June 3, 2013, and will retain a professional engineer to conduct an annual inspection, beginning in 2013. NRG will evaluate

the development of a formal emergency action plan for the ponds. This evaluation will be completed by December 15, 2013.

South Ash Settling Pond, North Pond 2, and North Pond 3 (Drainage Areas)

In response to the recommendations of AMEC regarding the drainage areas, NRG will delineate in drawings the drainage area of each pond highlighting the storm water drains and catch basins that drain into the ponds. NRG will complete the drawings by December 15, 2013. Storm water from the drains and catch basins is pumped to the ponds and is controlled by the pump capacity rather than the drainage area.

Equalization Basins (Overflow Pipe)

In response to the recommendations of AMEC regarding the overflow pipe, NRG will lower the existing overflow pipe a minimum of one foot. NRG will complete this project by December 15, 2013.

North Pond 2 and North Pond 3 (Pond Elevation)

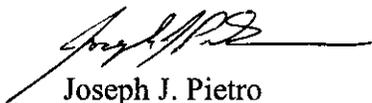
In response to the recommendations of AMEC regarding pond elevation, NRG will investigate and determine the correct freeboard values for North Ponds 2 and 3 pond elevations pursuant to the questions raised in Section 4.2.1 of the Report. This determination will be completed in conjunction with the geotechnical study.

South Ash Settling Pond (PMF)

In response to the recommendations of AMEC regarding the settling ash pond, NRG will retain the consultant who performed the hydrologic and hydraulic study for the pond to investigate whether there is a PMF determination for the Niagara River, and if so, to make the requested comparison between the 500-year flood used in the stability analyses and the ½ PMF. These investigations will be completed in conjunction with the geotechnical study.

Please direct any questions related to this submittal to my attention at (716) 879-3954.

Sincerely,



Joseph J. Pietro
Environmental Coordinator

cc: Thomas Coates
Joseph Schwab
Paul Leuthauser
Carson Leikam