



Dunkirk Power, LLC
106 Point Drive North
Dunkirk, NY 14048

May 15, 2018

Mr. David Vitale
New York State Department of Environmental Conservation
Division of Materials Management Director
625 Broadway
Albany, NY 12233-7250

RE: CCR Rule Implementation Notice

Dear Mr. Vitale:

Pursuant to the requirements of §257.94(b), the first round of Detection Monitoring samples was collected from the CCR monitoring wells associated with the below CCR units located at Dunkirk (owned by Dunkirk Power LLC) generating station. In accordance with §257.93(h), analytical results from the downgradient wells were reviewed and evaluated to identify the potential existence of statistically significant increases (SSIs) over background groundwater concentrations. This evaluation, completed on January 15, 2018, did yield the identification of SSIs for several Appendix III constituents across multiple downgradient well locations. As there were no efforts performed in support of an Alternate Source Demonstration for the listed CCR units, and in consideration of the SSIs being valid and representative, Assessment Monitoring Programs for the affected CCR unit is being established to comply with the obligations of §257.94(e)(1).

Accordingly, this notification is being made by Dunkirk Power LLC to satisfy the requirements of §257.94(e)(3), including documented placement of this information into the facility's operating records [§257.105(h)(5)]. This notification is being further provided to the State to comply with the obligations of §257.106(h)(4), and will also be posted on the publicly accessible website per §257.107(h)(4). This posting will be available on our public website at <http://www.nrg.com/legal/coal-combustion-residuals/>

The Dunkirk Steam Electric Generating Station has one CCR Unit subject to the rule. This is the Dunkirk Power LLC Solid Waste Management Facility, Permit ID 9-0658-00021/00008.

Should you require additional information, please contact George Streit at (716) 200-2797 or George.Streit@NRG.com.

Sincerely,

A handwritten signature in black ink, appearing to read "George T. Streit". The signature is written in a cursive, flowing style.

George T. Streit
Environmental Coordinator

xc: Peter Grasso, P.E., 270 Michigan Ave., Buffalo, NY 14203