CCR COMPLIANCE
GROUNDWATER MONITORING AND CORRECTIVE ACTION
ANNUAL REPORT
DUNKIRK LANDFILL

Prepared for:

Dunkirk Power LLC
Dunkirk Generating Station
Dunkirk, New York

Prepared by:

Aptim Environmental & Infrastructure, Inc.
Pittsburgh, Pennsylvania

January 2018

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1.0 Introduction

Title 40 Code of Federal Regulations (CFR) §257.90 mandates that existing Coal Combustion Residuals (CCR) landfills and surface impoundments, also known as CCR units, be subject to groundwater monitoring and corrective action requirements as further detailed in §257.91 through §257.98. These requirements are part of the overall CCR Rule (or Rule) which was published in the Federal Register on April 17, 2015 and which became effective on October 19, 2015. Specific obligations for Owners and Operators of existing CCR units regarding the preparation of "Annual Groundwater Monitoring and Corrective Action Reports (Annual Report)" are outlined in §257.90(e)(1-5). The first of these Annual Reports must be completed no later than January 31, 2018, and provide information to address the following aspects for the preceding calendar year:

- Document the status of the groundwater monitoring and corrective action program for the respective CCR units;
- Summarize key actions completed;
- Describe any problems encountered and actions taken to resolve the problems; and
- Offer a projection of key activities for the upcoming year.

At a minimum, the Annual Report must contain the following information to the extent applicable and available:

- A map, aerial image, or diagram showing the CCR unit and all background/upgradient and downgradient monitoring wells, to include the well identification numbers, that are part of the groundwater monitoring program;
- Identification of any monitoring wells that were installed or decommissioned during the preceding year, along with a narrative description of why those actions were taken;
- In addition to all the monitoring data obtained under §257.90 through §257.98, a summary including the number of groundwater samples that were collected for analysis for each background/upgradient and downgradient well, the dates the samples were collected, and whether the sample was required by the detection monitoring or assessment monitoring programs;
- A narrative discussion of any transition between monitoring programs (e.g., the date and circumstances for transitioning from detection monitoring to assessment monitoring in addition to identifying the constituent(s) detected at a statistically significant increase over background levels); and
- Any other information required to be included as specified in §257.90 through §257.98.

The Dunkirk Generating Station, owned by Dunkirk Power LLC, is a coal-fired power plant located in Dunkirk, New York. The facility was mothballed and ceased electric generating operations in early-2016, subsequent to the effective date of the Rule. The Rule applies to this facility due to the management/disposal of CCR materials resulting from the previous coal combustion activities. Accordingly, the Station's captive disposal site, located in Pomfret, New York and identified as the Dunkirk Landfill, has been designated as an existing CCR unit. This unit has a dedicated groundwater monitoring well network that meets the requirements of §257.91 with regard to number and appropriate locations of wells (certification provided under separate cover).

In summary, this Annual Report has been prepared to comply with the requirements of §257.90(e) with respect to documenting the groundwater monitoring and corrective actions undertaken during Calendar Year 2017 for the Dunkirk Landfill CCR Unit. This Annual Report and all subsequent reports thereto will be placed in the Station's operating record per §257.105(h)(1), noticed to the State Director per §257.106(h)(1), and posted to the publicly accessible internet site per §257.107(h)(1).

2.0 Dunkirk Landfill

2.1 Groundwater Monitoring Network

The CCR groundwater monitoring system for the Dunkirk Landfill is comprised of five wells, including Well BR-14-UG (upgradient), and Wells BR-3-DG, BR-12-DG, BR-13-DG, and BR-20-DG (downgradient). The locations of the wells are shown on the attached Figure 1, along with depiction of the generalized groundwater flow direction in the area of the landfill. Each of these wells was already existing, and no new wells were added nor were any existing wells abandoned/replaced during the 2017 reporting period.

2.2 2017 Data Collection

Per the requirements of §257.94(b), Detection Monitoring was ongoing throughout 2017, including activities to ensure the collection of a minimum of eight independent samples from each of the background/upgradient and downgradient wells associated with the Dunkirk Landfill. These samples were analyzed for the necessary Appendix III and Appendix IV constituents, with the results summarized in the attached Tables 1 and 2, respectively. In addition, a ninth round of samples was collected (October 2, 2017) and analyzed for Appendix III constituents only. The results from these samples (also shown in Table 1) will serve as the first point of comparison to determine if concentrations in any of the downgradient wells are at levels representing a statistically significant increase (SSI) over the background concentrations established in the upgradient well(s).

2.3 2017 Monitoring Program Transitions

During 2017, there were no transitions between monitoring programs. Only activities in support of the Detection Monitoring program were conducted.

2.4 2017 Corrective Actions

During 2017, there were no problems identified or corrective actions undertaken.

2.5 2018 Projected Activities

No later than January 15, 2018, the results from the ninth round of Detection Monitoring sampling will be reviewed against the Appendix III background concentrations and preliminary identification of any SSIs completed. If SSIs are identified, subsequent activities could include performance of an Alternate Source Demonstration [per §257.94(e)(2)] to potentially negate the SSIs (and remain in Detection Monitoring), and/or entry into the Assessment Monitoring program [per §257.94(e)(1)] should the SSIs be deemed valid. Completion of the Alternate Source Demonstration or entry into the Assessment Monitoring program must be accomplished within 90 days, or no later than April 15, 2018.

Tables

Table 1
Dunkirk Power LLC
Dunkirk Landfill--Groundwater Analytical Data
CCR Appendix III Constituents

Monitoring Well	Date Sampled	Total Boron (mg/L)	Total Calcium (mg/L)	Total Chloride (mg/L)	Total Fluoride (mg/L)	Total Dissolved Solids (mg/L)	Sulfate (mg/L)	pH (S.U.)
BR-14-UG (Upgradient)	17-Nov-15	0.183	100	3.6	< 0.20	370	82	7.53
	9-Feb-16	0.200	89	3.4	< 0.20	435	78	6.56
	11-May-16	0.164	86	3.1	0.22	430	73	7.24
	30-Aug-16	0.185	87	3.6	< 0.20	470	87	6.98
	9-Nov-16	0.160	92	4.1	< 0.20	575	159	7.33
	14-Feb-17	0.175	108	4.3	< 0.20	480	133	7.17
	16-May-17	0.157	81	3.5	< 0.20	460	91	7.42
	15-Aug-17	0.228	111	3.4	0.21	505	128	6.42
	2-Oct-17	0.154	103	4.0	< 0.20	570	147	7.10
BR-3-DG (Downgradient)	17-Nov-15	0.098	141	45.9	< 0.20	545	159	7.23
	9-Feb-16	0.078	119	32.8	< 0.20	590	155	7.50
	11-May-16	0.098	111	23.0	< 0.20	560	137	7.16
	30-Aug-16	0.096	114	28.8	< 0.20	585	159	7.01
	9-Nov-16	0.088	115	84.9	< 0.20	705	152	7.13
	14-Feb-17	0.092	151	99.7	< 0.20	590	161	7.19
	16-May-17	0.062	113	58.1	< 0.20	580	150	6.55
	15-Aug-17	0.135	139	69.4	0.27	600	158	6.98
	2-Oct-17	0.095	134	77.4	0.38	700	165	7.32
BR-12-DG (Downgradient)	17-Nov-15	0.163	197	319	< 0.20	825	66	6.94
	9-Feb-16	0.104	177	263	< 0.20	920	151	7.00
	11-May-16	0.083	156	158	< 0.20	780	168	7.29
	30-Aug-16	0.173	166	329	< 0.20	1040	70	7.04
	9-Nov-16	0.179	222	375	< 0.20	1260	62	7.00
	14-Feb-17	0.117	241	422	< 0.20	1030	109	7.07
	16-May-17	0.068	160	299	< 0.20	1100	139	6.54
	15-Aug-17	0.181	174	299	< 0.20	1030	83	6.99
	2-Oct-17	0.163	196	421	1.04	1250	70	6.94
BR-13-DG (Downgradient)	17-Nov-15	0.223	109	8.8	< 0.20	495	67	7.23
	9-Feb-16	0.162	109	7.9	< 0.20	560	129	7.25
	11-May-16	0.151	115	7.1	< 0.20	620	161	7.23
	30-Aug-16	0.304	118	8.6	< 0.20	560	59	7.09
	9-Nov-16	0.164	85	7.3	< 0.20	560	127	7.20
	14-Feb-17	0.144	113	7.6	< 0.20	545	140	7.21
	16-May-17	0.103	97	7.1	< 0.20	585	142	6.79
	15-Aug-17	0.274	103	8.4	0.21	500	60	7.03
	2-Oct-17	0.240	96	8.4	< 0.20	565	41	7.19
BR-20-DG (Downgradient)	17-Nov-15	1.42	26	2.8	< 0.20	670	102	7.61
	9-Feb-16	1.40	24	12.2	0.35	725	< 2.0	7.74
	11-May-16	1.44	22	33.0	0.35	720	< 2.0	7.85
	30-Aug-16	1.39	24	25.4	0.36	685	< 4.0	6.97
	9-Nov-16	1.35	19	15.5	0.22	675	< 2.0	7.69
	14-Feb-17	1.56	25	16.5	0.39	635	< 2.0	7.69
	16-May-17	1.37	21	15.5	< 0.20	675	< 2.0	7.71
	15-Aug-17	1.42	25	38.3	0.41	655	< 2.0	7.58
	2-Oct-17	1.24	22	21.6	0.42	720	< 4.0	7.32

= Data to be compared against calculated Background values from the upgradient well.

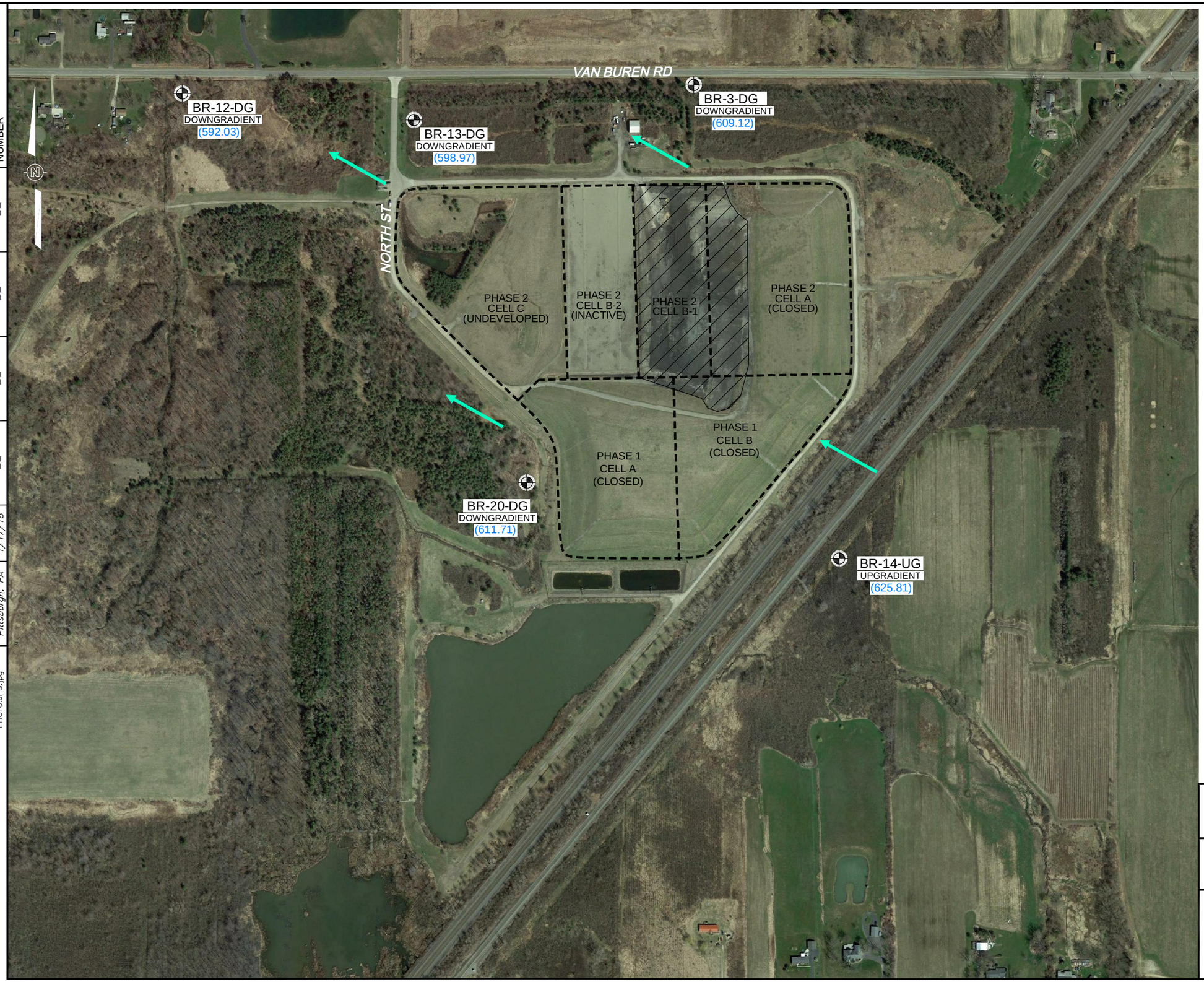
Table 2
Dunkirk Power LLC
Dunkirk Landfill--Groundwater Baseline Analytical Data
CCR Appendix IV Constituents

Monitoring Well	Date Sampled	Total Antimony (mg/L)	Total Arsenic (mg/L)	Total Barium (mg/L)	Total Beryllium (mg/L)	Total Cadmium (mg/L)	Total Chromium (mg/L)	Total Cobalt (mg/L)	Total Fluoride (mg/L)	Total Lead (mg/L)	Total Lithium (mg/L)	Total Mercury (mg/L)	Total Molybdenum (mg/L)	Total Selenium (mg/L)	Total Thallium (mg/L)	Total Radium-226 and 228 (pCi/L)
BR-14-UG (Upgradient)	17-Nov-15	< 0.060	0.009	0.21	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.23
	9-Feb-16	< 0.060	< 0.005	0.33	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.24
	11-May-16	< 0.060	< 0.005	0.20	< 0.005	< 0.005	< 0.005	< 0.050	0.22	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.18
	30-Aug-16	< 0.060	0.008	0.24	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	0.0000005	< 0.010	< 0.005	< 0.010	1.25
	9-Nov-16	< 0.060	< 0.005	0.05	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.23
	14-Feb-17	< 0.060	< 0.005	0.09	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.22
	16-May-17	0.0010	< 0.005	0.11	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.33
	15-Aug-17	0.0025	< 0.005	0.10	< 0.004	< 0.005	< 0.005	< 0.050	0.21	< 0.005	< 0.050	< 0.0000010	< 0.010	< 0.005	< 0.0007	< 1.22
BR-3-DG (Downgradient)	17-Nov-15	< 0.060	0.008	0.05	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	0.006	< 0.050	< 0.0000005	< 0.010	< 0.005	0.012	0.22
	9-Feb-16	< 0.060	< 0.005	0.04	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.22
	11-May-16	< 0.060	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.76
	30-Aug-16	< 0.060	0.008	0.04	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	1.23
	9-Nov-16	< 0.060	< 0.005	0.03	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.28
	14-Feb-17	< 0.060	0.006	0.04	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.31
	16-May-17	0.0016	< 0.005	0.03	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.0007	1.28
	15-Aug-17	0.0040	< 0.005	0.05	< 0.004	< 0.005	< 0.005	< 0.050	0.27	< 0.005	< 0.050	< 0.0000010	< 0.010	< 0.005	< 0.0007	1.23
BR-12-DG (Downgradient)	17-Nov-15	< 0.060	0.006	0.07	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	0.014	0.35
	9-Feb-16	< 0.060	< 0.005	0.06	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.16
	11-May-16	< 0.060	< 0.005	0.04	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.31
	30-Aug-16	< 0.060	0.009	0.09	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	1.61
	9-Nov-16	< 0.060	< 0.005	0.08	< 0.005	< 0.005	0.045	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.45
	14-Feb-17	< 0.060	< 0.005	0.08	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	1.22
	16-May-17	0.0022	< 0.005	0.04	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.22
	15-Aug-17	0.0045	< 0.005	0.08	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000010	< 0.010	< 0.005	< 0.0007	0.32
BR-13-DG (Downgradient)	17-Nov-15	< 0.060	< 0.005	0.08	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	0.012	0.36
	9-Feb-16	< 0.060	< 0.005	0.08	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.45
	11-May-16	< 0.060	< 0.005	0.07	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.44
	30-Aug-16	< 0.060	0.008	0.11	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	1.39
	9-Nov-16	< 0.060	< 0.005	0.05	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.33
	14-Feb-17	< 0.060	< 0.005	0.06	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.17
	16-May-17	0.0015	< 0.005	0.05	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.24
	15-Aug-17	0.0030	< 0.005	0.09	< 0.004	< 0.005	< 0.005	< 0.050	0.21	< 0.005	< 0.050	< 0.0000010	< 0.010	< 0.005	< 0.0007	0.34
BR-20-DG (Downgradient)	17-Nov-15	< 0.060	0.006	1.50	< 0.005	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	1.53
	9-Feb-16	< 0.060	< 0.005	1.83	< 0.005	< 0.005	< 0.005	< 0.050	0.35	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	1.71
	11-May-16	< 0.060	< 0.005	1.57	< 0.005	< 0.005	0.006	< 0.050	0.35	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	2.13
	30-Aug-16	< 0.060	0.006	1.93	< 0.005	< 0.005	< 0.005	< 0.050	0.36	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	2.04
	9-Nov-16	< 0.060	< 0.005	1.25	< 0.005	< 0.005	< 0.005	< 0.050	0.22	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	0.61
	14-Feb-17	< 0.060	< 0.005	1.88	< 0.005	< 0.005	< 0.005	< 0.050	0.39	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.010	2.20
	16-May-17	0.0014	< 0.005	1.53	< 0.004	< 0.005	< 0.005	< 0.050	< 0.20	< 0.005	< 0.050	< 0.0000005	< 0.010	< 0.005	< 0.0007	0.99
	15-Aug-17	0.0016	< 0.005	1.84	< 0.004	< 0.005	< 0.005	< 0.050	0.41	< 0.005	< 0.050	< 0.0000010	< 0.010	< 0.005	< 0.0007	0.77

Figures

DRAWING NUMBER	APPROVED BY	CHECKED BY	DRAWN BY	DESIGNED BY	DATE
631229736-B2	--	--	--	--	1/17/18

OFFICE: Pittsburgh, PA



LEGEND:

- BR-20-DG (611.71) — CCR GROUNDWATER MONITORING WELL WITH GROUNDWATER ELEVATION MEASURED ON OCTOBER 2, 2017
- ACTIVE AREAS
- GROUNDWATER FLOW DIRECTION

REFERENCE:

GOOGLE AERIAL PHOTOGRAPH, DATED 10/2016.

SCALE

0 400 800 FEET

APTIM
500 Penn Center Boulevard,
Suite 1000
Pittsburgh, Pennsylvania 15235

nrg

FIGURE 1

CCR COMPLIANCE GROUNDWATER MONITORING WELL LOCATION MAP DUNKIRK LANDFILL

DUNKIRK GENERATING STATION
DUNKIRK, NEW YORK

File: O:\PROJECT\NRG DUNKIRK\631229736-B2.dwg
Plot Date/Time: Jan 17, 2018 - 1:19pm
Plotted By: Evan.Schlegel
Xref : photo 3.jpg
Image : PHOTO.JPG.jpg