

Transmitted Via Electronic Mail

November 30, 2020

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

Re: Coal Combustion Residuals Rule Notifications
Greenidge Generation LLC
Greenidge Power Generating Station

Dear Mr. Vitale,

Greenidge Generation LLC owns and operates the Greenidge Power Generating Station (Greenidge) in the Town of Torrey, Yates County, New York. When 40 CFR Part 257 Subpart D, *Standards for the Disposal of Coal Combustion Residuals in Landfills and Surface Impoundments* (the CCR Rule) went into effect in 2015, Greenidge Station was in protective layup status and had ceased producing electricity using coal. When Greenidge entered protective layup status in 2011, the operation included one surface impoundment, C-Pond, to which bottom ash materials were sluiced. All fly ash was handled using dry management processes and hauled off-site for disposal.

Per the definition in the CCR Rule¹, C-Pond was classified as an inactive surface impoundment. C-Pond was not initially subject to the CCR Rule because the CCR Rule does not apply to electric utilities or independent power producers that have ceased producing electricity prior to October 19, 2015 (40 CFR 257.50(e)). However, in March 2017, Greenidge began producing electricity with natural gas and the CCR Rule does apply to inactive CCR surface impoundments at active electric utilities or independent power producers, regardless of the fuel currently used at the facility to produce electricity (40 CFR 257.50(c)). Consequently, C-Pond must now comply with the 40 CFR Part 257 Subpart D regulations for existing CCR surface impoundments.

Pursuant to the requirements of §257.107(a) of the CCR Rule, the documents listed on the next page have been placed in the Greenidge operating record, and on a publicly accessible internet site (<https://greenidgeccr.com>), maintained by Greenidge Generation LLC.

¹ “Inactive CCR surface impoundment means a CCR surface impoundment that no longer receives CCR on or after October 19, 2015 and still contains both CCR and liquids on or after October 19, 2015.”


CCR DOCUMENTATION

Document Title	Reference Citation
Location Restrictions Certification	40 CFR Parts 257.60(a) thru 64(a)
Liner Design Certification	40 CFR Part 257.71(a)
Fugitive Dust Control Plan	40 CFR Part 257.80(b)
Groundwater Monitoring System Certification	40 CFR Part 257.91(f)
Statistical Methods Certification	40 CFR Part 257.93(f)(6)
Written Closure Plan	40 CFR Part 257.102(b) & 40 CFR Part 257.103(f)(2)(iv)
Notice of Intent to Comply with Alternative Initiation of Closure	40 CFR 257.103(f)(2)(viii)
Written Post-Closure Plan	40 CFR 257.104(d)

Thank you for your consideration of the above. As always, please do not hesitate to contact me if you have any questions or concerns about the information provided herein.

Sincerely;

EnSol, Inc.



Bethany Acquisti, Ph. D
Senior Scientist

Ec: Dale Irwin - Greenidge Generation LLC
Chris Gill – Greenidge Generation LLC
Edward McTiernan - Partner Arnold & Porter
David H. Critchfield - EMSOURCE Group Companies
David Lenox - EnSol, Inc.