



Former Mt. Tom Station Power Plant
200 Northampton Street
Holyoke, Massachusetts

**Coal Combustion Residuals
Legacy Surface Impoundments-
Annual Inspection Report**

**Mt. Tom Generating Company LLC
Houston, Texas**

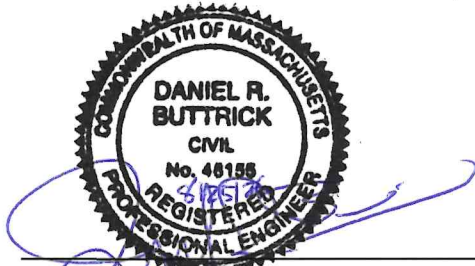
August 2026

Certification

The assessment of the general condition of the Coal Combustion Residuals Legacy Surface Impoundments (LSIs or units) reported herein was based upon available data and visual inspections. Detailed investigations and analyses involving topographic mapping, subsurface investigations, testing and detailed computational evaluations are beyond the scope of this report, unless noted otherwise.

Note that the reported condition of the units was based on field observations completed at the time of the inspection, along with data available to the inspection team.

It is crucial to note that the condition of the units depends on numerous and constantly changing internal and external conditions and is dynamic in nature. It would be incorrect to assume that the reported condition of the units will continue to represent the condition of the units at some point in the future. Only through continued care and inspection can there be any chance that unsafe conditions are detected.



Daniel R. Buttrick, PE
Massachusetts License No.: 48155
License Type: Civil
Senior Project Manager
Tighe & Bond, Inc.

Table of Contents

SECTION 1 Introduction	1-1
1.1 Rule Requirements and Applicability	1-1
1.2 Project Background	1-1
1.2.1 Bottom Ash Basin A	1-2
SECTION 2 Annual Inspection Criteria	2-1
2.1 Changes in Geometry (§257.83(b)(2)(i))	2-1
2.2 Existing Instrumentation (§257.83(b)(2)(ii))	2-1
2.3 Depth and Elevation of Impounded Water and CCR (§257.83(b)(2)(iii))	2-1
2.4 Storage Capacity (§257.83(b)(2)(iv))	2-1
2.5 Volume of Impounded Water and CCR (§257.83(b)(2)(v))	2-1
2.6 Appearances of Structural Weakness and Disruptive Conditions (§257.83(b)(2)(vi))	2-1
2.7 Other Changes (§257.83(b)(2)(vii))	2-1

Figures

Figure 1: Site Location

Figure 2: Aerial Site Plan

Appendices

Appendix A: Photographic Log

SECTION 1 | Introduction

Mt. Tom Generating Company LLC ("MTGC"), a wholly owned indirect subsidiary of ENGIE North America Inc., retained Tighe & Bond, Inc. ("Tighe & Bond") to perform an annual visual inspection and prepare a report documenting the observed conditions at the Coal Combustion Residuals ("CCR") Legacy Surface Impoundment ("LSI") at the former MTGC facility, located at 200 Northampton Street in Holyoke, Massachusetts (the "site"). This annual inspection report has been prepared in accordance with the requirements of 40 CFR §257.83(b) of the United States Environmental Protection Agency ("USEPA") published Final Rule for Hazardous and Solid Waste Management System - Disposal of Coal Combustion Residual (the "Final Rule"). For reference, Figure 1 is a Site Location map and Figure 2 is an Aerial Site Plan which illustrates relevant site features.

1.1 Rule Requirements and Applicability

In accordance with 40 CFR §257.83(b) *Annual inspections by a qualified professional engineer*, "If the... legacy CCR surface impoundment is subject to the periodic structural stability assessment requirements under 40 CFR § 257.73(d), 257.74(d), the CCR unit must additionally be inspected on a periodic basis by a qualified professional engineer to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards."

The CCR Rule requires annual inspections by a qualified professional engineer for CCR LSIs with a height of five feet or more and a storage volume of 20 acre-feet or more, or for CCR surface impoundments with a height of 20 feet or more (§257.73(b), 257.73(d), and 257.83(b)). The former MTGC station includes two CCR LSIs located on the eastern portion of the site adjacent to the Connecticut River. These LSIs are identified as "Bottom Ash Basin A" (and "Basin A") and the "Special Basin" and are further described below.

Based on the information presented in the reports *Hazard Potential Classification - Special Basin* and *Hazard Potential Classification - Bottom Ash Basin A*, dated May 2026, prepared by Tighe & Bond, the following was identified for the Special Basin and Bottom Ash Basin A:

- The width (east to west) of Basin A varies from 300 feet to 360 feet, and it is approximately 360 feet long (north to south) with a maximum depth of approximately 15 feet, and a maximum structural height (compared to the elevation at the downstream toe) of approximately 12.5 feet. The maximum storage of the basin is approximately 29.3 acre-feet. **Since this volume exceeds 20 acre-feet, the requirements of §257.73 are applicable.**
- The Special Basin is approximately 190 feet wide by 390 feet long with a maximum depth of approximately 14 feet, and a maximum structural height (compared to the elevation at the downstream toe) of approximately 12.5 feet. **The maximum storage of the basin is approximately 12.2 acre-feet. Since the volume is less than 20-acre feet the requirements of §257.73 are not applicable.**

1.2 Project Background

The former coal-fired electrical generating MTGC station is located at 200 Northampton Street ("Route 5") in Holyoke, Hampden County, Massachusetts. The former facility comprises approximately 143 acres and is located adjacent to the western bank of the Connecticut River, where the river forms the eastern site boundary. Route 5 and a railroad corridor abuts the site to the west.

The former station was operational through 2014, when it was permanently shut down. From 2014 through 2022, the facility underwent closure through plant demolition, environmental assessment, remediation, and ecological restoration in accordance with the 2018 Massachusetts Department of Environmental

Protection ("MassDEP") Administrative Consent Order ("ACO"), ACO-00002589, under MassDEP Release Tracking Number (RTN) 1-20229.

The facility generally consists of vegetated land, including mature, forested areas. The only remaining aboveground structure is an electrical substation located to the east of the former generation plant building, which is operated by Eversource Energy ("Eversource"). Additionally, overhead electrical distribution lines, owned and operated by South Hadley Electric Light Department, are present at the site. Transmission lines owned by Eversource run along the eastern portion of the site. On-going activities across the site include periodic inspections to verify that site conditions are consistent with the 2022 Activity and Use Limitation ("AUL"), which was implemented as part of the Temporary Solution in accordance with the Massachusetts Contingency Plan ("MCP"). Additional site history has been provided in previous MassDEP regulatory submittals, which can be reviewed online at <https://eeaonline.eea.state.ma.us/EEA/fileviewer/Rtn.aspx?rtn=1-0020229>.

1.2.1 Bottom Ash Basin A

Basin A is a formerly lined earthen basin located approximately 1,500 feet south of the former MTGC power plant. The basin was constructed in the 1980s as an unlined basin and is generally square in shape. The basin functioned as part of the facility's Industrial Wastewater Treatment Plant ("IWWTP"). Coal bottom ash and boiler slag was pumped into Basin A for settling. The supernatant water was then pumped out, the pH adjusted, and then discharged to the Connecticut River.

In 2003, Basin A was lined with a double high-density polyethylene (HDPE) impermeable liner with seepage collection between the layers. In March 2020, Basin A was decommissioned in accordance with the MassDEP ACO under a Release Abatement Measure ("RAM") Plan. Regulatory documents associated with the RAM activities can be found at the website provided in Section 1.2.1. Prior to conducting decommissioning activities, an assessment was completed at Basin A (June 2017). At that time, the basin was generally dewatered and mostly accessible without the use of a boat. The depth of the basin contents was measured at five locations throughout the unit, with an average calculated thickness of approximately 2.3-feet. Based on the dimensions of the unit, it was estimated that approximately 9,000 cubic yards of inundated CCR was present above the liner at that time, noting that this was an over-estimate of the amount of CCR in the basin due to the saturated nature of the material.

In March 2020, the liner and pump piping were removed from the basin. An environmental contractor used an excavator to strategically peel back and remove the liner system in sections, exposing the sand bedding material. In accordance with the MassDEP-approved plan, the sediment materials which were present within the basin were left in place after the liner materials were removed. There is a 12-inch diameter outlet pipe through the embankment that formerly directed discharges toward the Connecticut River that was plugged at the ends in 2020.

Basin A is approximately rectangular in shape. The western and southern sides of Basin A are incised approximately 12 feet below the adjacent grades (with a maximum depth of approximately 15 feet, and a maximum structural height, compared to the elevation at the downstream toe, of approximately 12.5 feet) and sloped at approximately three horizontal units to one vertical unit (3H:1V). The northern side of the impoundment is partially incised, sharing an embankment with the historical coal pile sump area and the Special Basin. The shared embankment has a crest width of approximately 50 feet. The Basin A side of the embankment has a total height of approximately 14 feet, and is sloped at approximately 3H:1V. The northern side of the embankment is four to ten feet in height and is also sloped at approximately 3H:1V. The eastern embankment, which separates Basin A and the Connecticut River, is approximately 14 feet in height and has a crest width of approximately 12 feet. The impoundment side is sloped at approximately 3H:1V which became vegetated following the removal of the liner system in 2020, and was recently mowed with brush clearing

Section 1 | Introduction

along the fences, subsequently hydroseeded (along with the other slopes), and mulched during Fall 2025 to further promote vegetation growth. The river side of the embankment is sloped at approximately 2H:1V and is vegetated with grasses, brush, and mature trees.

As detailed in Tighe & Bond's Initial Hazard Classification Report, dated May 2026, Basin A is classified as a low hazard impoundment as defined in §257.53.

SECTION 2 | Annual Inspection Criteria

The annual inspection of Basin A was conducted on April 24, 2026. A photographic Log from the day of the inspection is included as Appendix A. The following sections summarize the reporting requirements under §257.83(b)(2):

2.1 Changes in Geometry (§257.83(b)(2)(i))

There have been no changes in geometry since the previous annual inspection.

2.2 Existing Instrumentation (§257.83(b)(2)(ii))

There is no existing instrumentation.

2.3 Depth and Elevation of Impounded Water and CCR (§257.83(b)(2)(iii))

No impounded water was present. No CCR has been added since the previous annual inspection.

2.4 Storage Capacity (§257.83(b)(2)(iv))

The storage capacity of 52,400 cubic yards remains unchanged from the previous inspection.

2.5 Volume of Impounded Water and CCR (§257.83(b)(2)(v))

No water was impounded. The previously estimated volume of 9,000 cubic yards of CCR remains unchanged.

2.6 Appearances of Structural Weakness and Disruptive Conditions (§257.83(b)(2)(vi))

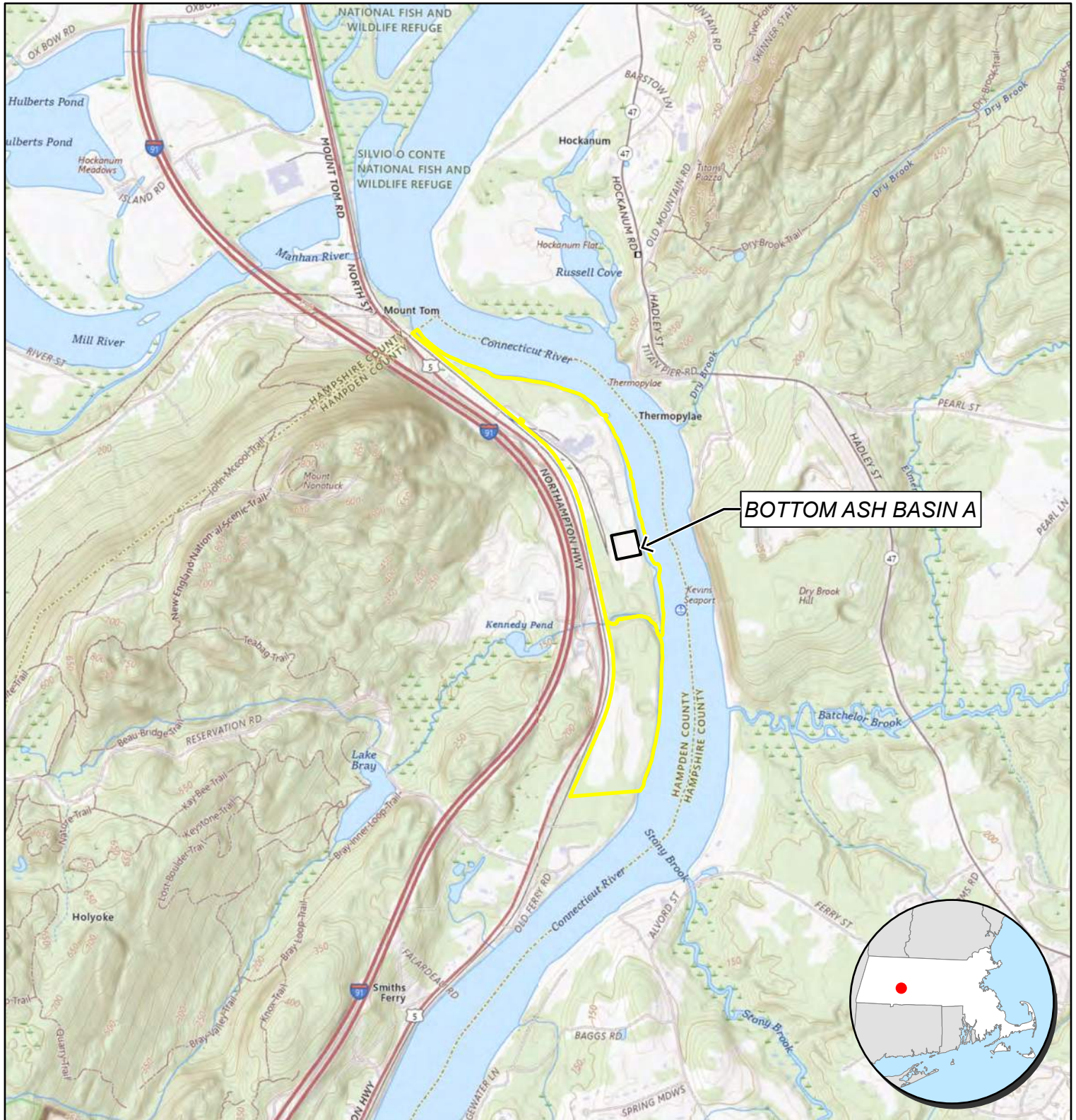
No significant additional structural weaknesses were identified. Visually-evaluated disruptive conditions remain, which include trees growing on the eastern, western, and northwestern exterior slopes. One area of minor erosion was noted along the interior edge of the south embankment crest.

2.7 Other Changes (§257.83(b)(2)(vii))

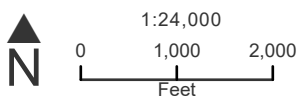
None observed.



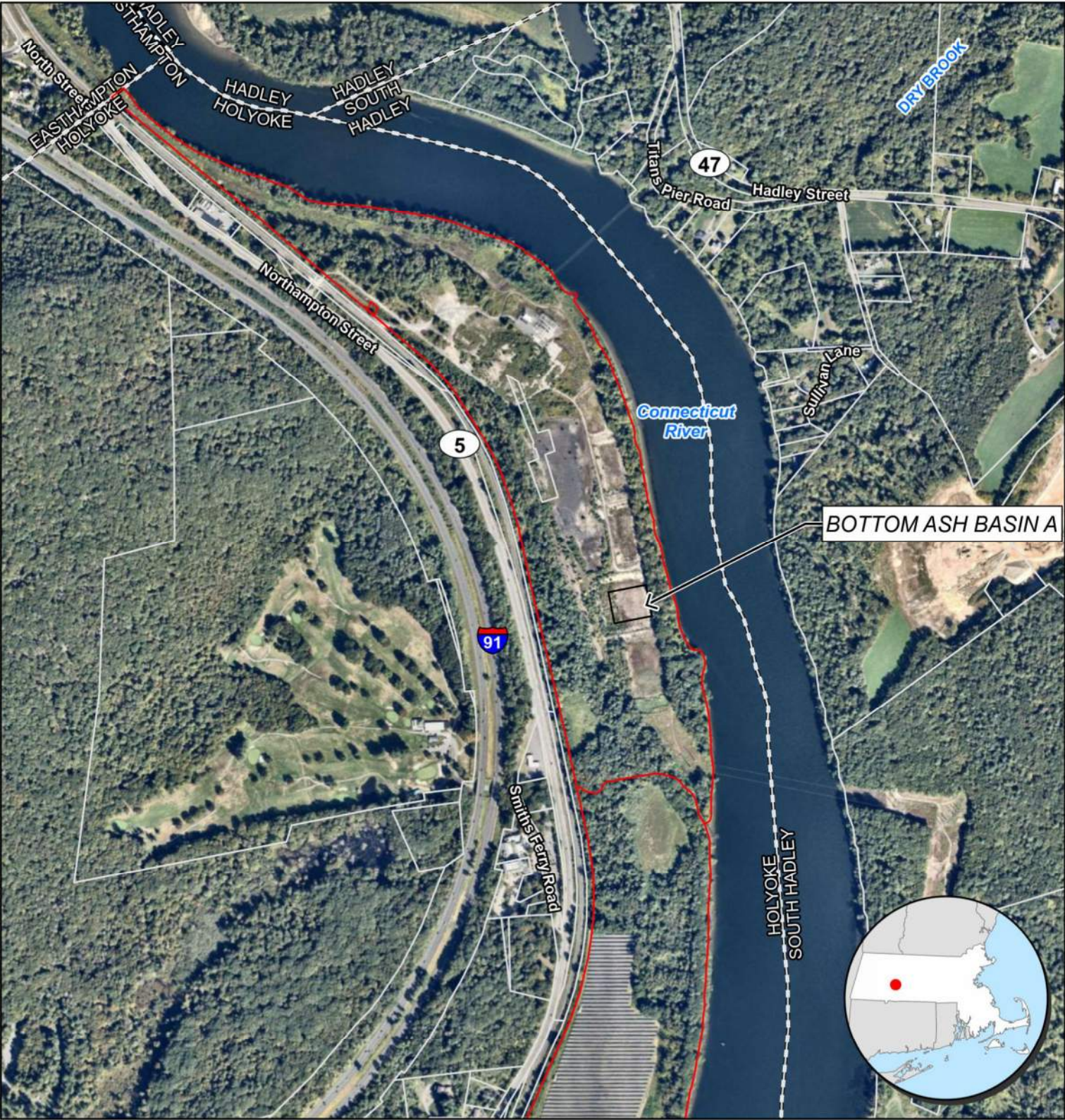
Figures



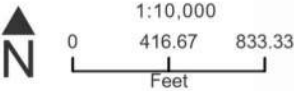
- Bottom Ash Basin A
- Subject Property



Based on USGS The National Map Topo Basemap.
 Contour Interval Equals 10 Feet.
 Parcel Boundary is courtesy of MassGIS and is approximate.



- Property Boundary
- Parcel Boundary
- Municipal Boundary



Based on latest Noemap Imagery.

**Appendix A:
Photographic Log**



Photo 1 - Bottom Ash Basin A east interior slope; vegetation remains sparse but area has been seeded and mulched



Photo 2 - East embankment crest; note sparse vegetation and minor rutting



Photo 3 - East embankment exterior slope; note trees and brush



Photo 4 - Interior of basin from northeast corner



Photo 5 - Berm along top of interior slope



Photo 6 - North interior slope; vegetation remains sparse but area has been seeded and mulched.



Photo 7 - Repaired area that was previously low and eroded



Photo 8 - Location of recent test boring



Photo 9 - Recent test boring



Photo 10 - Access cover along east embankment crest



Photo 11 - Bare area on east embankment crest



Photo 12 - East interior slope from south; vegetation remains sparse but area has been recently seeded and mulched



Photo 13 - East embankment crest from south; note marginal vegetation



Photo 14 - East exterior slope from south; note heavy trees and brush



Photo 15 - South interior slope; vegetation remains sparse but slope has been recently seeded and mulched



Photo 16 - South embankment crest; area appeared to have been mulched



Photo 17 - South embankment crest; area appeared to have been mulched



Photo 18 - Erosion along top of south interior slope



Photo 19 - South interior slope from west looking east; brush along fence line has been cleared



Photo 20 - West embankment crest looking north; brush along fence line has been cleared



Photo 21 - Bottom Ash Basin A bottom from southwest corner



Photo 22 - Repaired section of chain link fence



Photo 23 - West interior slope; vegetation remains sparse but slope has been recently seeded and mulched



Photo 24 - West exterior slope; note small trees, brush, and woody vegetation



Photo 25 - West interior slope from north; woody vegetation has been removed



Photo 26 - South interior slope; woody vegetation has been removed; slope has recently been seeded and mulched



Photo 27 - South crest; note brush



Photo 28 - North exterior slope along coal pile sump; note woody vegetation



Photo 29 - North exterior slope along coal pile sump; note woody vegetation



Photo 30 - North exterior slope along Special Basin