

Memorandum

Date: 28 December 2020

To: Ray Butts – Gulf Power Company

From: Lane Dorman, P.G.(FL) and Ben Amos, Ph.D., P.E.(FL) – Geosyntec Consultants, Inc.

Subject: Remedy Selection Semi-Annual Progress Report
Gypsum Storage Area, Gulf Power Company, Plant Crist, Pensacola, Florida

Geosyntec Consultants, Inc. (Geosyntec) prepared this memorandum in accordance with 40 CFR §257.97(a) to provide a semi-annual progress update on the remedy selection process for the Gypsum Storage Area (GSA) coal combustion residuals (CCR) unit at Gulf Power Company (Gulf Power) Plant Crist in Pensacola, Florida. An assessment of corrective measures (ACM) was completed to evaluate remedial options to address statistically significant levels (SSLs) of total radium observed in groundwater downgradient of the GSA, as documented in the 11 June 2019 *Assessment of Corrective Measures Report* (Report). The most recent *Remedy Selection Semi-Annual Progress Report* (Update) was provided on 29 June 2020.

Since completion of the Update, the following additional evaluation and monitoring activities have been performed:

- continued groundwater monitoring;
- continued assessment of the nature and extent of SSLs; and
- evaluation of temporal constituent concentration trends.

These activities, which will be documented in the *2020 Annual Groundwater Monitoring and Corrective Action Report*, will aid Gulf Power in remedy selection.

Since completion of the Update, Gulf Power has accelerated plans to convert Plant Crist's coal-fired generating units completely to natural gas-fueled power generating operations. As part of the conversion from coal to natural gas, Gulf Power is considering methods for the closure of the GSA, which will affect the potential corrective measures available to the GSA CCR unit. Additional evaluation regarding the long-term management strategy of the GSA is ongoing and a remedy will be selected upon completion of this evaluation.

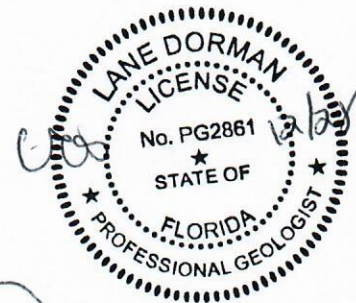
As remedy selection continues, the existing groundwater extraction system at the facility was transitioned to serve as a temporary corrective measure for the GSA CCR unit. The goal of the

temporary corrective measure is to promote constituent mass removal until a final remedy is selected and implemented.

A final groundwater remedy will be selected pursuant to the requirements identified in 40 CFR §257.97. As remedy selection continues, groundwater assessment monitoring will be performed in accordance with 40 CFR §257. Until remedy selection is complete, semi-annual progress updates will continue to be prepared.

This update was prepared in accordance with the requirements of 40 CFR Part 257 under the supervision of the undersigned State of Florida licensed Professional Engineer and Professional Geologist.

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