

## Memorandum

Date: December 16, 2022

To: Billi Jo Huddleston – Florida Power & Light 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, Florida Power & Light Company,  
Gulf Clean Energy Center, Pensacola, Florida

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Geosyntec Consultants, Inc. (Geosyntec) prepared this memorandum in accordance with 40 CFR §257.97(a) to provide a semi-annual progress report on the remedy selection process for the Gypsum Storage Area (GSA) coal combustion residuals (CCR) unit at Florida Power & Light Company's (FPL) Gulf Clean Energy Center (GCEC) 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. The most recent *Remedy Selection Semi-Annual Progress Report* was provided on July 1, 2022.

Since completion of the July 2022 report, the following additional evaluation and monitoring activities were performed to aid FPL in remedy selection:

- continued groundwater monitoring;
- continued assessment of the nature and extent of SSLs in groundwater;
- continued beneficial use of CCR contained in the GSA;
- evaluation of temporal constituent concentration trends in groundwater; and
- initial consideration of the following elements to facilitate remedy selection:
  - preliminary planning for potential evaluation of monitored natural attenuation (MNA) for total radium at the GSA; and
  - additional review of the existing Alternate Source Demonstration (ASD) for total radium to assess the potential for naturally occurring radionuclides to cause rather than only contribute to total radium SSLs, as currently indicated in the ASD.

Relevant groundwater-related activities will be documented in the *2022 Annual Groundwater Monitoring and Corrective Action Report*.

Since the July 2022 report, FPL continued evaluation of methods for closure of the GSA. The GSA no longer receives CCR following the facility ceasing coal-fired operations in October 2020. The GSA is undergoing engineering design evaluation for closure by removal in accordance with 40

CFR §257.102(c), as documented in the October 15, 2021 *Closure Plan – Revision 01*. This is a change from the originally posted Closure Plan, dated October 17, 2016, where closure in place was identified. Similarly, since the ACM and associated public meeting, the closure strategy was reevaluated by FPL. Closure by removal was selected, consistent with the ongoing removal of gypsum for beneficial use, which is anticipated to be completed by the end of 2023.

As gypsum removal from the GSA for beneficial use continues, additional evaluation regarding the overall long-term management strategy of the GSA is ongoing in light of the change in closure method. Since remedy selection is partially dependent on this evaluation, the groundwater remedy will be finalized upon completion of the long-term management strategy for the GSA.

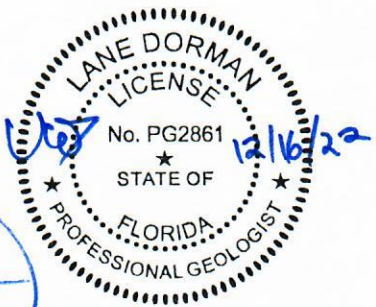
In addition, FPL is preparing a CCR permit application for the Florida Department of Environmental Protection in accordance with Florida’s CCR rules (Rules 62-701.804 and .805, Florida Administrative Code) generally applicable to facilities that construct, operate, modify, or close a CCR unit such as the GSA.

As remedy selection continues, the existing groundwater extraction system at the GSA will continue operation as a temporary measure for the GSA.

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

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