

## Memorandum

Date: June 30, 2023

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 December 16, 2022.

Since completion of the December 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 removal of CCR contained in the GSA for beneficial reuse;
- evaluated temporal constituent concentration trends in groundwater;
- evaluated alternate background groundwater monitoring locations; and
- continued 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
  - 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 *2023 Annual Groundwater Monitoring and Corrective Action Report*.

Since the December 2022 remedy selection progress report, FPL submitted their CCR Surface Impoundment Closure Permit application for the GSA to the Florida Department of Environmental Protection on March 9, 2023. Following this submittal, FPL posted on March 9, 2023, their *Notice of Intent to Close CCR Unit* to the publicly accessible website and initiated engineering closure design for closure by removal in accordance with 40 CFR §257.102(c), as documented in the October 15, 2021 *Closure Plan – Revision 01*. FPL plans to select a construction contractor to begin closure activities following completion of engineering closure design and removal of CCR within the GSA, which is anticipated by the end of 2023.


With GSA closure by removal of CCR, additional evaluation regarding the overall long-term management strategy of the GSA is ongoing, including continued review of the existing 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. Since remedy selection is dependent on this evaluation, a remedy, if required, will be finalized upon completion of the long-term management strategy for the GSA.

The existing groundwater extraction system at the GSA will continue to operate as a temporary measure for the GSA until closure activities are initiated.

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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