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Memorandum

Date: January 17, 2024

To: Billi Jo Huddleston, CHMM, Florida Power & Light Company

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

Subject: 2021 Groundwater Velocity Estimate, Gulf Clean Energy Center,

Gypsum Storage Area, Pensacola, FL

INTRODUCTION

On behalf of Florida Power & Light Company ("FPL"), Geosyntec Consultants, Inc. ("Geosyntec") prepared this 2021 Groundwater Velocity Estimate Memorandum ("Memo") for FPL's Gulf Clean Energy Center ("GCEC") Coal Combustion Residuals ("CCR") unit Gypsum Storage Area ("GSA"). The purpose of this Memo is to document the calculated horizontal groundwater velocities at the GSA in 2021. This Memo supplements the summary of CCR groundwater monitoring activities conducted in 2021 and reported in the 2021 Annual Groundwater Monitoring and Corrective Action Report (Geosyntec, 2022¹), in accordance with groundwater sampling and analysis requirements of 40 Code of Federal Regulations ("CFR") Section 257.93(c).

GROUNDWATER VELOCITY CALCULATIONS

Groundwater flow rates were calculated based on the following:

- 1. Horizontal hydraulic gradients estimated from groundwater elevations measured during each sampling event in 2021.
- 2. The geometric mean (geomean) hydraulic conductivity (64 feet per day [ft/day]) for GSA documented in the *APT Well Installation, Development, and Testing Report, Crist Generating Plant* (Geosyntec, 2017²).

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¹ Geosyntec Consultants, 2022. 2021 Annual Groundwater Monitoring and Corrective Action Report, Florida Power & Light Company, Gulf Clean Energy Center, Gypsum Storage Area. January 28, 2022.

² Geosyntec Consultants, 2017. APT Well Installation, Development, and Testing Report, Crist Generating Plant. November.



3. An estimated effective porosity of 0.25, based on the lithologic materials surrounding the screened interval (Sterrett, 2007³).

Input parameters and calculations are summarized in **Table 1**. Groundwater elevation maps from 2021 are included as **Figures 1 and 2**.

Horizontal hydraulic gradients between MW-204 and MW-206, a monitoring well-pair representative of groundwater flow near GSA, were calculated based on groundwater elevation data from both 2021 groundwater sampling events. The resulting horizontal gradients were approximately 0.0026 ft/ft and 0.0022 ft/ft in March and September 2021, respectively.

The geomean hydraulic conductivity for the uppermost aquifer adjacent to the GSA was estimated from aquifer testing data from seven extraction wells around the GSA (Geosyntec, 2017). The lithology of this aquifer generally consists of fine to coarse sand (SCS, 2017⁴); the geomean hydraulic conductivity (64 ft/day) is within the anticipated hydraulic conductivity range for a fine to coarse sand (Freeze and Cherry, 1979⁵).

The horizontal groundwater flow velocity was calculated using a form of Darcy's Law:

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V = (K*i)/n_e Where: V = \text{groundwater velocity (ft/day);} K = \text{hydraulic conductivity (ft/day);} i = \text{horizontal hydraulic gradient (ft/ft); and} n_e = \text{effective porosity (unitless).}
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The calculated horizontal groundwater flow velocities at GSA were 0.66 ft/day (240 ft/year) in March 2021 and 0.57 ft/day (209 ft/year) in September 2021.

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³ Sterret, R.J., 2007. *Groundwater and Wells*, Third Edition, New Brighton, MN: Johnson Screens, A Weatherford Company.

⁴ Southern Company Services, 2017. Gulf Power Company, Plant Crist, Ash Landfill No. 1, Ash Landfill No. 2, and Gypsum Storage Area Well Design, Installation, Development and Decommissioning Report, October.

⁵ Freeze, R.A. and J.A. Cherry, 1979. *Groundwater*, Englewood Cliffs, NJ: Prentice Hall.



In accordance with the groundwater sampling and analysis requirements of 40 CFR Section 257.93(c), the horizontal groundwater velocities calculated for the selected well pair at GSA (i.e., MW-204 and MW-206) were approximately 0.66 ft/day (240 ft/year) in March 2021 and 0.57 ft/day (209 ft/year) in September 2021. The calculated horizontal groundwater velocities for 2021 are similar to those calculated previously (Geosyntec, 2023⁶). This Memo has been prepared under the supervision of a State of Florida licensed Professional Engineer and Professional Geologist with Geosyntec.

⁶ Geosyntec Consultants, Inc., 2023. 2022 Annual Groundwater Monitoring and Corrective Action Report, Florida Power & Light Company, Gulf Clean Energy Center Gypsum Storage Area, January 31, 2023 FR8309/PR23037 January 17, 2024



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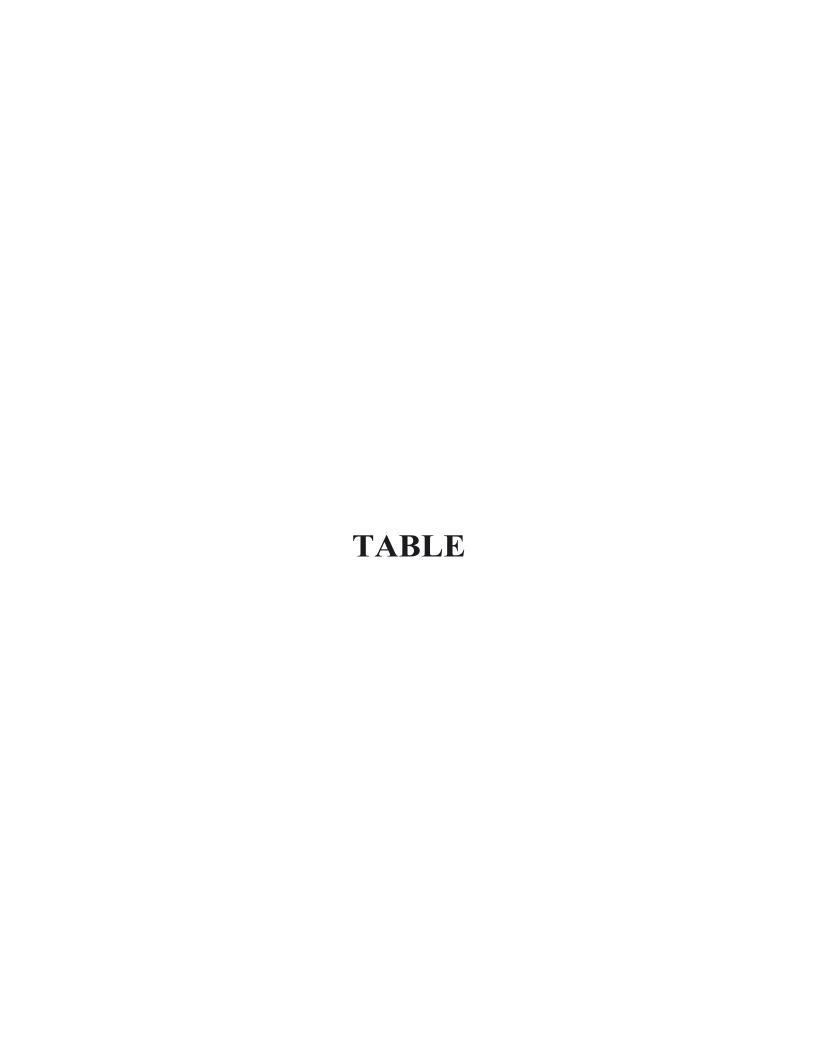


Table 1. 2021 Groundwater Velocity Input Parameters and Calculations Gulf Clean Energy Center, Gypsum Storage Area Pensacola, FL

Flow Paths	Groundwater Elevation (ft) ^{1,2}		Change in Groundwater Elevation (Δh) ³ (ft)	Distance (Δl) ³ (ft)	Hydraulic Gradient (Δh/Δl) ³ (ft/ft) ⁴	Conductivity V Porocity Groundwictor		_	
								ft/day	ft/year ⁸
MW-204/ MW-206	Mar-21	6.50	4.34	1687	0.0026	64	0.25	0.66	240.3
		2.16							
MW-204/ MW-206	Sep-21	7.39	3.78		0.0022			0.57	209.3
		3.61							

Notes:

- 1. Elevations are in feet relative to the North American Vertical Datum of 1988.
- 2. ft = feet
- 3. Δh = Change in groundwater elevation, Δl = Distance along flow path
- 4. ft/ft = feet per foot
- 5. K is the geometric mean of 2017 aquifer testing results from seven extraction wells around the gypsum storage area.
- 6. ft/day = feet per day
- 7. Groundwater flow velocity equation = $(\Delta h/\Delta l * K)/\eta$
- 8. ft/year = feet per year

