



2025 Annual Inspection Report for CCR Impoundment

Gulf Clean Energy Center CCR Gypsum Storage Area (GSA)
Pensacola, FL

January 16, 2026

Annual CCR Inspection performed by
Florida Power and Light
PGD Civil Fleet Team

Introduction

On November 6, 2025, an inspection of Gulf Clean Energy Center (GCEC) Coal Combustion Residual (CCR) Gypsum Storage Area (GSA) was performed in Pensacola, FL. The inspection was performed in accordance with and to meet the requirements of 40 Code of Federal Regulations (CFR) §257.83(b). The inspection was performed by the Florida Power and Light (FPL) Civil Fleet Team (CFT) which is a part of the Engineering and Operations Support and Services group within the Power Generation Division (PGD). The CFT provides civil engineering support for FPL's generating fleet. The inspection was performed by Rachel Mudd Garrett, PE (FL License Number 74170).

The GCEC GSA is currently inactive following the facility ceasing coal fired operation in October 2020 and is undergoing closure construction activities for closure by removal in accordance with 40 CFR §257.102(c).

Review of Historical Information §257.83 (b) (1) (i)

In accordance with §257.83(b)(1)(i), FPL reviewed available information regarding the status and conditions of the GCEC GSA. The documents and items reviewed included:

- Closure Plan (Rev. 01 October 2021) – Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Structural Stability Assessment (Rev. 01 October 2021) - Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Safety Factor Assessment (Rev. 01 October 2021) - Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Hazard Potential Classification (Rev. 01 October 2021) - Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Inflow Design Flood Control System Plan (October 20221) - Gulf Clean Energy Center Gypsum Storage Area (GSA)
- History of Construction (November 2021) - Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Emergency Action Plan (April 2022) - Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Notice of Intent to Close (March 2023) – Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Post Closure Care Plan (Rev. 02 May 2025) – Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Report of Annual Inspection 2024 (January 2025) – Gulf Clean Energy Center Gypsum Storage Area (GSA)
- Construction drawings of closure project (issued for construction May 2025)
- Weekly inspection logs by site personnel
- Discussions with plant personnel prior to the annual inspection

Inspection Summary – §257.83 (b) (1) (ii) and §257.83 (b) (1) (iii)

FPL conducted a visual inspection of the GCEC Gypsum Storage Area on November 6, 2025. The inspection evaluated the conditions of the impoundment, exterior slopes, interior slopes and construction areas, stormwater management controls to identify any signs of distress or malfunction as applicable. The visual inspection also included any hydraulic structures underlying the base of the CCR unit or passing through the dike of the CCR unit to evaluation for structural integrity and continued safe and reliable operation as applicable.

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

Since the previous annual inspection, major changes in geometry were noted. Specifically, the CCR is in the process of being removed completely and impoundment slopes are being prepared to be removed entirely after the removal of CCR.

Instrumentation – §257.83 (b) (2) (ii)

No instrumentation equipment is currently in place, and none has been added since the previous annual inspection. Because of this, no instrumentation readings were available to review.

Approximate Water and CCR Volume – §257.83 (b) (2) (iii) and §257.83 (b) (2) (v)

At the time of the inspection, less than one foot of water was being impounded in the CCR Unit. All water currently impounded was from recent rain at the time of the inspection.

At the time of the inspection, all CCR had been removed from the impoundment, so the approximate volume of CCR was zero (0) cubic yards.

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

Less than the previous estimate of 257,680 cubic yards was available at the time of the inspection due to the ongoing construction. An updated storage capacity estimate mid-closure was not available at the time of the inspection. As the impoundment walls are removed, storage capacity will be reduced until zero storage capacity remains.

Structural Weakness or Disrupting conditions – §257.83 (b) (2) (vi)

At the time of the inspection, no actual or potential structural weaknesses were noted. No existing conditions that might disrupt or have the potential to disrupt safety of the CCR Unit and appurtenant structures was noted. Any disrupting conditions to the operation of the CCR Unit at the time of the inspection were according to the closure per the closure plan in the record.

Other Changes – §257.83 (b) (2) (vii)

As noted, at the time of the inspection, the impoundment was undergoing closure per the closure plan in the operating record. No other changes were noted that might have affected the stability or operation of the impounding structure since the previous annual inspection.

Certification

Based on the review of the above information along with a visual site inspection on November 6, 2025, it is my opinion that this annual inspection report has been completed in accordance with 40 CFR 257.83(b).



1/16/2026

Rachel Mudd Garrett, PE
Manager, Civil Engineering Fleet Team
FL PE License No. 74170

Date



This item has been digitally signed and sealed by Rachel Mudd Garrett, PE on the date adjacent to the seal.

Signature must be verified on any electronic copies.