

Memorandum

Date: June 28, 2021

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, Gulf Clean Energy Center,
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) 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, as documented in the June 11, 2019 *Assessment of Corrective Measures Report*. The most recent *Remedy Selection Semi-Annual Progress Report (Update)* was provided on December 28, 2020.

Since completion of the Update, the following additional evaluation and monitoring activities were 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 *2021 Annual Groundwater Monitoring and Corrective Action Report*, will aid Gulf Power in remedy selection.

Since the Update, Gulf Power completed conversion of GCEC's coal-fired generating units 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. One potential closure option under consideration at the GSA is closure by removal of CCR materials, potentially followed by conversion of the GSA to a stormwater holding pond. Additional evaluation regarding the long-term management strategy of the GSA is ongoing. Since remedy selection is partially dependent on this evaluation, the groundwater remedy will be selected following selection of a long-term management strategy of the GSA.

As remedy selection continues, the existing groundwater extraction system at the facility will continue 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.

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.



Lane Dorman

Lane Dorman, P.G.
Florida Professional Geologist No. PG2861

Benjamin K. Amos, Ph.D., P.E.
Florida Professional Engineer No. 82837