

## Memorandum

Date: July 1, 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 update on the remedy selection process for the Gypsum Storage Area (GSA) coal combustion residuals (CCR) unit at Florida Power & Light Company (FPL) Gulf Clean Energy Center in Pensacola, Florida. An assessment of corrective measures 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 17, 2021.

Since completion of the Update, 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;
- 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 Update, 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*. Although the GSA has begun gypsum removal for beneficial reuse, additional evaluation regarding the long-term management strategy of the GSA is still ongoing. Since remedy selection is partially dependent on this evaluation, the groundwater remedy will be finalized once the long-term management strategy of the GSA has been determined.

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.

This update 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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