

Memorandum

Date: January 5, 2024

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

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 June 30, 2023.

Since completion of the June 2023 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;
- evaluation of temporal constituent concentration trends in groundwater;
- sampling of an additional groundwater monitoring location to further evaluate background conditions; and
- sampling of CCR material in the gypsum storage pond (GSP) for analysis of total radium via synthetic precipitation leaching procedure (SPLP) to evaluate potential sources of total radium in groundwater.

Relevant groundwater-related activities will be documented in the *2023 Annual Groundwater Monitoring and Corrective Action Report*.

Since the last remedy selection progress report on August 21, 2023, FPL received a *Notice of Intent to Issue Permit* from the Florida Department of Environmental Protection (FDEP) to close the GSA. It is anticipated that FDEP will issue the closure permit in January 2024. FPL plans to select

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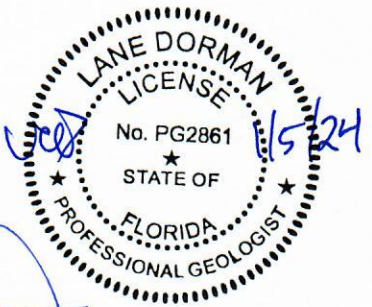
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a construction contractor to begin closure activities following completion of engineering closure design and removal of CCR contained within the GSA. Closure will be accomplished by removal, which will be designed and implemented in accordance with 40 CFR §257.102(c), as documented in the October 15, 2021 *Closure Plan – Revision 01*.

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

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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