

Memorandum

Date: June 28, 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 January 5, 2024.

Since completion of the January 2024 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;
- evaluation of the contribution of naturally occurring radionuclides to total radium SSLs; and
- evaluation of appropriate GSA management strategies.

Relevant groundwater-related activities will be documented in the *2024 Annual Groundwater Monitoring and Corrective Action Report*.

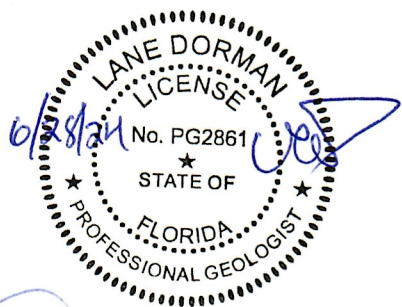
FPL plans to select a construction contractor to begin closure activities following completion of engineering closure design and removal of CCR contained within the GSA for beneficial use. The closure will be accomplished by removal, which will be designed and implemented per 40 CFR §257.102(c), as documented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

With GSA closure by removal, additional evaluation regarding the GSA management strategy is ongoing, including a potential update to the remedial strategies presented in the *2019 ACM Report*¹. Based on supplemental data collected since the *2019 ACM Report* and the ongoing evaluation of the GSA management strategy, alternative approaches may be more appropriate than those outlined in the *2019 ACM Report*. For example, since source control will be achieved through closure by removal (CBR), long-term groundwater monitoring may be a more appropriate remedial approach for groundwater. Source control via CBR will (i) comply with the standards for the management of wastes as specified in the CCR Rule and (ii) eliminate the potential for CCR release from the GSA to the environment. The goal of long-term groundwater monitoring would be to verify that total radium activities at the GSA either (i) continue to decline and/or (ii) reach a level consistent with naturally occurring levels of total radium at the GSA.

Since remedy selection depends on this ongoing evaluation, a final remedy will be selected following the development of the GSA management strategy.

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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¹ Geosyntec Consultants, 2019. Assessment of Corrective Measures for Gypsum Storage Area, Gulf Power Company, Plant Crist. June 2019.