

## 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

Subject: Remedy Selection Semi-Annual Progress Report  
Ash Pond, Gulf Power Company, Plant Smith, Southport, 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 Ash Pond at Gulf Power Company (Gulf Power) Plant Lansing Smith in Bay County, Florida. An assessment of corrective measures (ACM) was completed to evaluate remedial options to address statistically significant levels (SSLs) of lithium and arsenic observed in groundwater downgradient of the Ash Pond, 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 the Update, Gulf Power completed the necessary pre-closure activities and improvements and ceased discharging process water and stormwater to the Ash Pond. Pre-closure activities included the construction of a lined wastewater pond and pipelines to direct plant process water and stormwater to the newly constructed lined pond. A *Notification of Intent to Initiate Closure* was completed on May 7, 2021 and posted to the Gulf Power CCR Website by June 7, 2021.

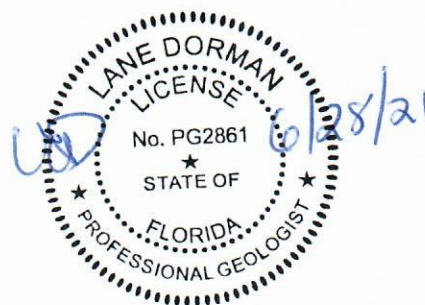
Initial closure activities include excavation of ash materials outside the limits of the recently constructed lined ponds, including the perimeter dike system. Excavated ash is being placed and compacted in the final closure area in accordance with the FDEP-approved closure plan.

Gulf Power continued to collect groundwater samples in general accordance with 40 CFR Part 257. Data collected to date are being used to assess temporal trends of constituent levels around the Ash Pond and delineate groundwater SSLs. Groundwater monitoring activities and a summary of data collected in 2021 will be documented in the *2021 Annual Groundwater Monitoring Report*, which will be finalized January 2022.

As documented in the ACM, monitored natural attenuation (MNA) is a potential remedial component under consideration to address observed groundwater SSLs downgradient of the Ash Pond. Gulf Power continued assessment of MNA in preparation for remedy selection. Specifically, bench scale tests were completed to assess the potential use of MNA as a remedial measure at the


Ash Pond. Preliminary evaluation of collected data indicates that MNA may be a viable remedy for the arsenic and lithium SSLs at Plant Smith.

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.



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