

Memorandum

Date: December 17, 2021

To: Ray Butts – Florida Power & Light 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, Florida Power & Light Company, Plant Smith
Bay County, 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 Ash Pond at Florida Power & Light Company (FPL, formerly Gulf Power Company) 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 June 28, 2021.

A *Notification of Intent to Initiate Closure* was completed on May 7, 2021, and posted to the Gulf Power Company CCR Website by June 7, 2021. Initial closure activities include excavation of ash materials outside the limits of 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.

FPL continued to collect groundwater samples in general accordance with 40 CFR Part 257, Subpart D. Data collected to date are being used to assess temporal trends of constituent levels around the Ash Pond and delineate groundwater SSLs. In addition, FPL installed monitoring wells MW-13R and MW-14R in November 2021. These monitoring wells serve to replace wells MW-13 and MW-14 (which were abandoned in August 2020 to facilitate pre-closure activities) and were sampled in accordance with 40 CFR Part 257, Subpart D. Groundwater monitoring and well installation 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. FPL completed an evaluation of MNA using the tiered guidance established by the United States Environmental Protection Agency (USEPA) and the Interstate Technology and Regulatory

December 17, 2021

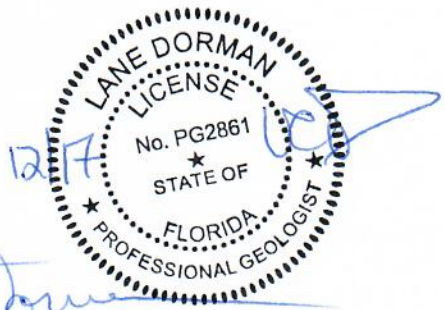
Page 2

Council (ITRC) in preparation for remedy selection. The evaluation indicated that MNA is a viable remedy for the arsenic and lithium SSLs at Plant Smith. A remedy selection report is currently being prepared.

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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12/17



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