

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

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) 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 17, 2021.

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-08R, MR-09R, and MW-10R in March 2022. These monitoring wells serve to replace wells MW-08, MW09, and MW-10 (which were abandoned to facilitate pre-closure activities) and were sampled in accordance with 40 CFR Part 257, Subpart D. Groundwater monitoring, monitoring well installation activities, and a summary of data collected in 2022 will be documented in the *2022 Annual Groundwater Monitoring and Corrective Action Report*, which will be finalized January 2023.

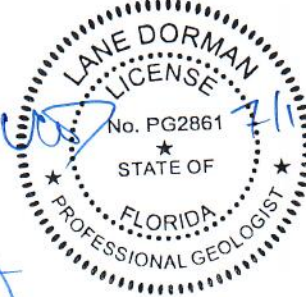
As documented in the ACM, monitored natural attenuation (MNA) is a potential groundwater remedial component under consideration to address observed groundwater SSLs downgradient of the Ash Pond. FPL completed an evaluation of MNA using the tiered guidance established by the United States Environmental Protection Agency (USEPA) and the Interstate Technology and Regulatory Council (ITRC) in preparation for remedy selection. The evaluation indicated that MNA is a viable groundwater remedy for the arsenic and lithium SSLs at Plant Smith. MNA is most appropriate as a groundwater remedial component when coupled with source control, which

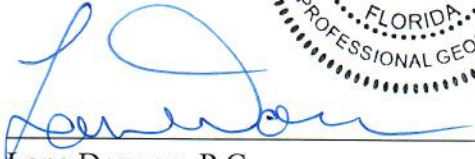
is ongoing at Plant Smith as discussed further below. A remedy selection report is currently being prepared.

In 2021, FPL completed necessary pre-closure activities and improvements in preparation to close the Ash Pond in accordance with the closure plan approved by the Florida Department of Environmental Protection (FDEP). Pre-closure activities included: (i) the construction of a lined wastewater pond and pipelines to direct non-CCR wastewater to the newly constructed lined wastewater pond; and (ii) cessation of the receipt of non-CCR wastewater to the Ash Pond. A *Notification of Intent to Initiate Closure* was completed on May 7, 2021, and posted to the FPL CCR Website. 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 dry stack area in accordance with the FDEP-approved closure plan. In 2017, a slurry wall (vertical barrier wall) around the perimeter of the capped CCR unit was added to the previously approved closure plan. The addition of the slurry wall as a component of the closure plan was approved by FDEP on September 14, 2017. Slurry wall installation is ongoing. Final closure certification is expected in the 2023-2024 timeframe. This in-place closure strategy will act to contain CCR and minimize potential future releases of CCR, consistent with the criteria for remedy selection outlined in 40 CFR §257.97.

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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