

## 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, Inc.

Subject: Remedy Selection Semi-Annual Progress Report  
Gypsum Storage Area, Florida Power & Light Company,  
Gulf Clean Energy Center, Pensacola, 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 Gypsum Storage Area (GSA) coal combustion residuals (CCR) unit at Florida Power & Light Company (FPL, formerly Gulf Power Company) Gulf Clean Energy Center in Pensacola, Florida. An assessment of corrective measures was completed to evaluate remedial options to address statistically significant levels (SSLs) of total radium observed in groundwater downgradient of the GSA, 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.

Since completion of the Update, the following additional evaluation and monitoring activities were performed:

- continued groundwater monitoring;
- continued assessment of the nature and extent of SSLs in groundwater; and
- evaluation of temporal constituent concentration trends in groundwater.

These groundwater-related activities, which will be documented in the *2021 Annual Groundwater Monitoring and Corrective Action Report*, will aid FPL in remedy selection.

Since the Update, FPL continued evaluation of methods for closure of the GSA. The GSA is currently inactive following the facility ceasing coal fired operations in October 2020 and is undergoing engineering design evaluation for closure by removal, as documented in the October 15, 2021 *Closure Plan – Revision 01*. Additional evaluation regarding the long-term management strategy of the GSA is ongoing. Since remedy selection is partially dependent on this evaluation, the groundwater remedy will be selected following selection of a long-term management strategy of the GSA.

December 17, 2021

Page 2


As remedy selection continues, the existing groundwater extraction system at the facility will continue as a temporary corrective measure for the GSA CCR unit. The goal of the temporary corrective measure is to promote constituent mass removal until a final remedy is selected and implemented.

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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