

Memorandum

Date: 29 June 2020

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

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's (Gulf Power's) 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 Ash Pond groundwater, as documented in the 11 June 2019 *Assessment of Corrective Measures Report* (Report). The last *Remedy Selection Semi-Annual Progress Report* (Update) was provided on 30 December 2019.

Since completion of the Report, Gulf Power has continued pursuing closure activities for the Ash Pond in accordance with a State-approved closure plan. Since the Update, additional groundwater monitoring data was collected in April 2020. Groundwater monitoring activities and a summary of data collected in 2020 will be documented in the next *Annual Groundwater Monitoring Report*. Groundwater data collected to date are being used to assess temporal trends of constituent levels around the Ash Pond.

As documented in the Report, monitored natural attenuation (MNA) is a potential remedial component under consideration for groundwater downgradient of the Ash Pond. Since completion of the Update, Gulf Power has continued to evaluate MNA in preparation for remedy selection. Specifically, geochemical conditions around the Ash Pond were evaluated and a preliminary one-dimensional Domenico groundwater flow model was developed to assess the potential of MNA at the Ash Pond to address observed groundwater SSLs. Based on preliminary results, Gulf Power identified additional data needed to support the evaluation of MNA prior to remedy selection.

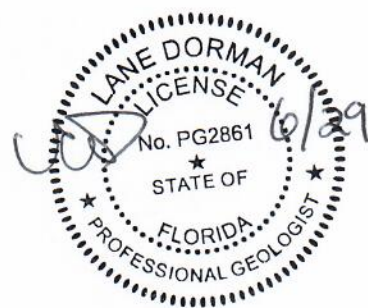
A final groundwater remedy will be selected pursuant to the requirements identified in 40 CFR §257.97, including consideration of stakeholder input. At least 30 days prior to the selection of a final remedy, a public meeting will be held in accordance with 40 CFR §256(e). Gulf Power will consider restrictions related to the ongoing COVID-19 pandemic when scheduling and holding the public meeting. Depending on the timing of the public meeting and final remedy selection, semi-

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annual progress updates will be prepared describing the progress in holding the public meeting and remedy selection.

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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 6/29/2020
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