

Memorandum

Date: 28 December 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 groundwater downgradient of the Ash Pond, as documented in the 11 June 2019 *Assessment of Corrective Measures Report* (Report). The most recent *Remedy Selection Semi-Annual Progress Report* (Update) was provided on 29 June 2020.

Since completion of the Update, Gulf Power has continued pursuing pre-closure activities for the Ash Pond in accordance with a State-approved closure plan. 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, groundwater and aquifer solids were collected from the vicinity of the Ash Pond for characterization and use in bench scale tests to assess the potential of MNA at the Ash Pond to address observed groundwater SSLs. Bench scale tests are ongoing and results from tests will be used to evaluate and support selection of a groundwater remedy for the Ash Pond.

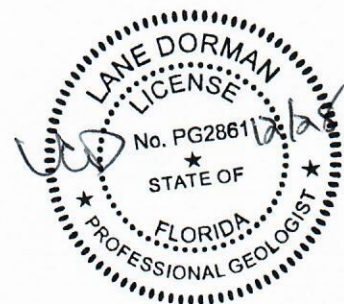
A final groundwater remedy will be selected pursuant to the requirements identified in 40 CFR §257.97, including consideration of stakeholder input. A public meeting to discuss the ACM was held in accordance with 40 CFR §257.96(e) in Southport, Florida on 18 December 2020. Notice of the public meeting was provided on 11 December 2020 in the Panama City News Herald. Until remedy selection is complete, semi-annual progress updates will continue to be prepared. As

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remedy selection continues, groundwater assessment monitoring will be performed in accordance with 40 CFR §257.

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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