



Groundwater Remedy Selection and Design Semi-Annual Report #2

June 12, 2020

Pursuant to 40 Code of Federal Regulations (CFR) Section (§) 257.97(a) of the Coal Combustion Residuals (CCR) Rule, Lakeland Electric is required to prepare a semi-annual report describing progress in selecting a remedy for the CCR unit that has been identified as potentially impacting groundwater based on a statistical assessment of groundwater data collected at the C.D. McIntosh Power Plant (Site) located in Lakeland, Florida. This document serves as the second semi-annual report prepared after initiating corrective measures at McIntosh Power Plant.

1. Summary of Activities Completed to Date

Golder and Associates (Golder) finalized a report presenting an *Assessment of Corrective Measures Byproduct Storage Area C.D. McIntosh Power Plant* on June 12, 2019. The assessment documents the development and evaluation of various corrective measures for the CCR unit including:

- Source control
- Monitored natural attenuation
- Enhanced monitored natural attenuation
- Groundwater pump and treat
- Installation of a hydraulic barrier
- Installation of a permeable reactive barrier
- Utilizing phytoremediation

Lakeland Electric has engaged an additional consultant, Geosyntec Consultants, Inc. (Geosyntec), to evaluate the CCR rule activities to date and to help evaluate potential next steps. This evaluation began October 2, 2019 and a finalized report was received January 21, 2020.

Golder and Geosyntec have submitted proposals for additional site characterization. After several rounds of fine-tuning a proposal for continuing work was accepted from Geosyntec. Due to effects from COVID-19, the task authorization was not brought before the City Commission until the May 18, 2020 meeting where the work was approved to move forward. Geosyntec to begin the next phase of work in June 2020.

2. Future Planned Activities

As identified in the *Assessment of Corrective Measures Byproduct Storage Area C.D. McIntosh Power Plant*, additional site characterization is necessary prior to selection and design of the remedies. Currently, expected planned activities may include:

- Identification and evaluation of appropriate source control measures relative to planned future operations of the Byproduct Storage Area
- Additional site characterization to evaluate feasibility of corrective measures including monitored natural attenuation (MNA)
- Developing a selection of remedy report
- Preparing semi-annual status reports and annual groundwater monitoring and corrective action reports
- Holding a public meeting before remedy selection
- Selecting a remedy

The next semi-annual report documenting progress in remedy selection at the Site will be prepared no later than December 12, 2020.