ALTERNATE SOURCE DEMONSTRATION FOR RADIUM 226 & 228 IN GROUNDWATER BYPRODUCT STORAGE AREA C.D. MCINTOSH POWER PLANT

LAKELAND, POLK COUNTY, FLORIDA

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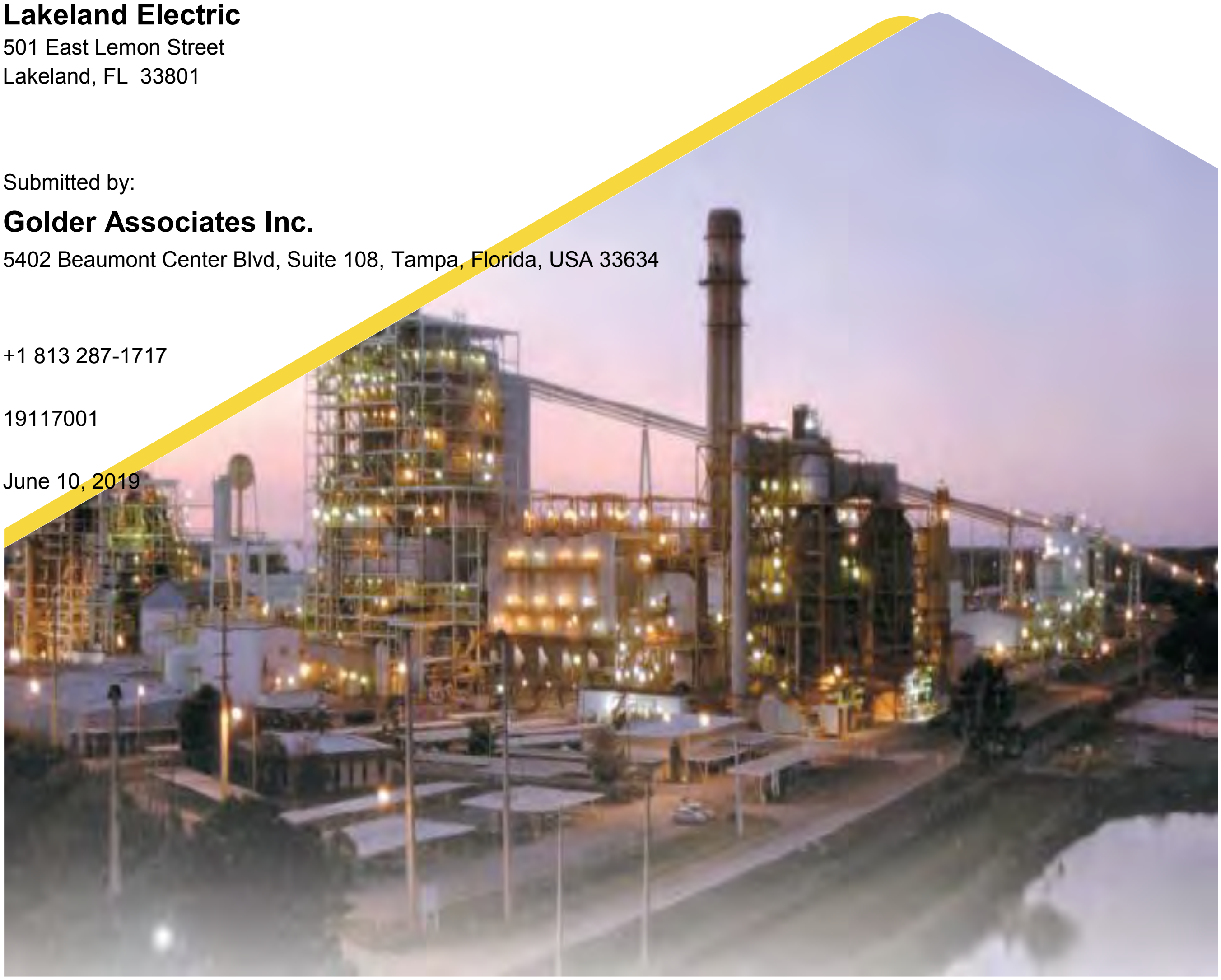
June 10, 2019



Distribution List

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1.0 INTRODUCTION

Golder Associates Inc. (Golder), on behalf of Lakeland Electric, prepared this alternative source demonstration (ASD) report for combined radium-226 and radium-228 (referred to as radium-226+228) detected in groundwater samples collected from the monitoring well network installed pursuant to the Coal Combustion Residual (CCR) Rule[1] for the Byproduct Storage Area (BSA) at the C.D. McIntosh Power Plant (MPP or site). Figure 1 presents a site location map and Figure 2 presents a map of the BSA and associated CCR monitoring well network. A statistical analysis of assessment monitoring results identified certain Appendix IV constituents in the uppermost aquifer at statistically significant levels (SSLs) above the groundwater protection standards (GWPS) established for the constituents for the site. The rule allows the owner or operator of a CCR unit to demonstrate that the SSL(s) are due to a source other than the CCR unit—an alternate source.[2] The statistical analysis of assessment monitoring of the CCR monitoring well network identified radium-226+228, arsenic, and lithium to be present at SSLs above the respective GWPS in groundwater samples from CCR monitoring wells listed below (Golder 2018b):

Appendix IV Parameter	GWPS	CCR Monitoring Well at SSL
Arsenic	0.010 mg/L	CCR-11 and CCR-12
Lithium	0.040 mg/L	CCR-5, CCR-6, CCR-9, and CCR-13
Radium-226+228	7.94 pCi/L	CCR-4, CCR-5, CCR-7, CCR-13 and CCR-14

pCi/L - Picocuries per liter

mg/L - milligrams per liter

The BSA is a unit that historically has received CCR generated by Unit 3 at the MPP, including fly ash, bottom ash, synthetic gypsum and stabilized flue gas desulfurization (FGD) material. The BSA encompasses approximately 44 acres and is located east of Unit 3 and adjacent to Fish Lake, Lakes B, C, and D, the south sedimentation pond, and the Stackout pad (Figures 2 and 3). The BSA, constructed in the 1980s, is an above-grade earthen containment unit surrounded by a perimeter ditch system.

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[1] Chapter 40 Code of Federal Regulations (CFR), Part 257, Subpart D.

[2] Chapter 40 CFR Section 257.95(g)(3)(ii).

2.0 PURPOSE AND BACKGROUND

2.1 Purpose

The purpose of this report is to provide information about a potential alternate source(s) for radium-226+228 that has been detected in groundwater from CCR monitoring wells at SSLs. The report presents a literature review of naturally occurring radioactive soils at the site and surrounding area (study area) and results of groundwater and soil assessments conducted at the site in February and March 2019.

This ASD report presents a description of the BSA and associated CCR monitoring well network, regional geologic and hydrogeologic conditions, site-specific hydrogeologic settings, a discussion on naturally-occurring radionuclides present in soil, sediment, and groundwater in central Florida; historical mining operations in the study area and at the BSA; and a review of historic aerial photographs and topographic maps of the BSA. Site characterization involved the installation of several soil borings / soil sampling adjacent to the monitoring wells where radium-226+228 was at SSLs in groundwater, as well as, the installation of additional soil borings, soil and sediment sampling, installation of “nature and extent” monitoring wells located hydraulically downgradient of the BSA, and groundwater and surface water sampling to evaluate the nature and extent of radium-226+228, arsenic and lithium for the SSLs in groundwater. Figure 4 presents the CCR monitoring well network (CCR-1 through CCR-14) and recently installed monitoring wells (CCR-15 through CCR-23) and existing MMP compliance monitoring wells[3] MW-24S, MW-25S, and MW-26S, which were used to evaluate the nature and extent of groundwater impacts at the BSA. Figure 4 also shows the location of soil borings drilled as part of site characterization. Site characterization included a geochemical assessment of select soil, sediment, and groundwater samples. This ASD also includes a mineralogical assessment for natural occurring radioactive minerals on select soil samples collected from the boreholes drilled adjacent to the CCR monitoring wells with radium-226+228 at SSLs above the GWPS (CCR-4, CCR-5, CCR-7, CCR-13, and CCR-14) and background well CCR-2.

2.2 Background

Radioactive decay products from naturally occurring radionuclides (e.g. uranium and thorium) are potential sources of radium-226+228 present in groundwater of the uppermost aquifer around and beneath the BSA. Past regional mineral resource evaluations reveal significant uranium-238 and other accessory constituents are associated with the phosphate ore that was mined at and near the BSA. Radium-226 and radium-228 are formed from the radioactive decay of uranium-238 and thorium-232, respectively. Radium-226 has a half-life of 1600 years and decays to form radon-222; radium-228 has a half-life of 5.8 years and decays to form actinium-228 (IAEA 2014).

Mining techniques used at the site prior to the construction of the BSA, typically resulted in fine-grained phosphatic materials (unrecoverable product) being left behind as mine tailings. Based on historic aerial photographs and topographic maps, a significant portion of the BSA footprint was constructed on previously mined land that was reclaimed (backfilled) with these fine-grained phosphatic mine tailings. Naturally occurring radionuclides are associated with phosphatic minerals, therefore, the mine tailings and unmined earth likely contain naturally occurring radionuclides. Also, a smaller portion of the land below ground surface (bgs) at the

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[3] MPP compliance monitoring is performed in accordance with the Conditions of Certification for the site.

BSA was likely unmined, due to mining limitations such as pit side-slope stability and setback considerations in proximity of surface water, roads, etc. Therefore, unmined phosphate minerals may exist in these areas.

Several soil borings drilled within the footprint of the BSA before its construction indicate the presence of phosphate materials, including the following:

- TH-10 (phosphate matrix material)
- TH-11 (clayey sand with phosphate)
- BH-11, TH-12 (sandy clay with phosphate)
- BH-13 (cemented silt with phosphate)

The locations of these, and other soil borings, and the associated cross-sections are shown in Appendix A.

3.0 REGIONAL AND SITE SETTING

3.1 Regional Geology

The MPP is located within the Central Florida Phosphate District, an area of economically important, high-grade phosphate deposits in the Lakeland Ridge and Polk Upland geomorphic provinces (Hurst and others 2016). Stratigraphic nomenclature in this District has evolved over the past 100 years, resulting in confusion when comparing literature discussing geology of the mining district. Lithologic/stratigraphic descriptions for older mines use stratigraphic nomenclature developed by Cathcart (1964). The updated stratigraphic nomenclature presented by Scott (1986 and 2016) is commonly used in more recent publications and is referenced in this summary report.

Stratigraphic units present in the region consist of (in descending order; youngest to oldest):

- Up to 25 feet (ft) of Holocene to Pliocene-age sands and clays occur in the Lakeland area (FGS 1991). The Holocene-age sands consist of laterally restricted deposits such as stream flood plains, beaches, swamps, marshes, and lakes. The Pleistocene to upper Pliocene-age sands and clays are locally phosphatic and generally occur as laterally consistent terrace deposits.
- The Miocene to Oligocene-age Hawthorn Group has an approximate thickness between 50 and 100 ft in the Lakeland area and is comprised of the Peace River and Arcadia Formations. In Polk County, the upper portion of the Peace River Formation includes the Bone Valley Member, which is characterized by phosphate-rich, pebbly- and clayey-sand soils overlain by weathered residuum (Scott 1988). Economic quantities of minable, phosphate-bearing minerals occur within the Bone Valley Member. The remainder of the Peace River Formation is undifferentiated, largely being comprised of sandy, phosphatic dolostone interbedded with laterally discontinuous layers of sand, clay, and limestone. The Arcadia Formation underlies the Peace River Formation and is comprised of clayey dolostone and limestone of the Tampa and Nocatee Members (Scott 1988). The top of the Hawthorn Group experienced significant karstic solutioning when sea levels declined, resulting in an irregular erosional surface with abundant depressions and hills. A layer of phosphatic conglomerate is located on this surface, providing further support that the contact between the surficial sands and clays and underlying Hawthorn Group is unconformable (Cathcart 1964). The estimated thickness of the Hawthorn Group in the vicinity of the MPP is approximately 40 to 60 ft (Cathcart 1964).
- Older units underlying the Hawthorn group in the region include the Suwannee Limestone, Ocala Limestone, Avon Park Formation and Oldsmar Formation. These units are Oligocene to Eocene age and are primarily comprised of limestone and/or dolostone, and generally do not contain economic quantities of phosphate-bearing minerals.

3.2 Regional Hydrogeology

The regional hydrogeology is comprised of three major hydrostratigraphic units: the unconfined surficial aquifer, the intermediate aquifer/confining unit, and the Floridan aquifer. The following discusses each system in its regional context:

- The unconfined surficial aquifer underlies all of Polk County and varies from less than 25 to 50 ft thick in northern Polk County (FGS, 1991). This water-table aquifer consists primarily of Holocene- to Pliocene-age sand, clay, shell, and phosphate deposits that are contiguous with the ground surface.

The base of the surficial aquifer system is formed by the clayey, less permeable beds of the Peace River Formation – Bone Valley Member (Scott 1988). The surficial aquifer system is used primarily for residential low-volume irrigation applications (e.g. lawn watering) where high discharge rates are not required (Scott 1988). Transmissivity within the surficial aquifer ranges from 2 to about 20 square ft per day (ft^2/day), where fine clayey sand predominates, to greater than 5,000 ft^2/day in shell beds (Golder 2005). Regional groundwater flow in the surficial aquifer typically mimics ground surface topography. The surficial aquifer is discharged by natural gravity flow, evapotranspiration, discharge to lakes, downward loss into underlying aquifers, and pumping from wells. The surficial aquifer is recharged by rainfall, infiltration and discharge from lakes, and stormwater.

- The hydrostratigraphic unit that underlies the surficial aquifer is referred to as the intermediate aquifer/intermediate confining unit. The intermediate confining unit is largely comprised of clayey sand, sandy clay and clays and underlying clayey dolomite and limestone of the Hawthorn Group.
- The confined, artesian Floridan aquifer is the principal aquifer in Polk County and is the source of major municipal, industrial, and irrigation water supplies. This aquifer occurs primarily within the Ocala Limestone and is locally hydraulically connected with the overlying intermediate aquifer/confining unit, where present, in areas where the confining unit is absent or breached. There is limited recharge to the Floridan aquifer near the MPP due to the presence of the confining unit. Transmissivity of the upper Floridan aquifer is highly variable, and ranges from less than 50,000 ft^2/day to greater than 9,000,000 ft^2/day. The potentiometric surface of the aquifer occurs at an elevation of approximately 75 ft above National Geodetic Vertical Datum or approximately 70 ft bgs in the area of the MPP with regional groundwater flow generally to the south-southwest (FGS 1991). Due to the relatively thick and continuous intermediate confining unit separating the Floridan aquifer from the surficial aquifer, exchange of groundwater between the two aquifers is limited beneath the MPP (Golder 2005).

3.3 Site Hydrogeology and BSA Monitoring Well Network

The BSA is underlain by two regional aquifers, the surficial aquifer and Floridan aquifer which are separated by an intermediate confining unit. The surficial aquifer represents the uppermost aquifer and is approximately 25 ft to 30 ft thick beneath the BSA (Golder 2005). The surficial aquifer consists primarily of Holocene- to Pliocene-age sand, clay, shell, and phosphate deposits. Groundwater in the surficial aquifer generally flows from topographic highs to topographic lows. Underlying the surficial aquifer below the BSA is the intermediate confining unit, which ranges in thickness from approximately 40 to 50 ft and consists of interbedded clay with silty to sandy clay, silt to clayey sand, sand to clayey silt, and limestone (Golder 2005). There is a small component of groundwater flow in the surficial aquifer that is vertically downward toward the intermediate confining unit, and Floridan aquifer. However, this vertical flow component is retarded by the clayey materials of the underlying intermediate confining unit (Golder 2005).

The CCR monitoring network at the BSA includes two background monitoring wells, CCR-1 and CCR-2, and twelve downgradient monitoring wells, CCR-3 through CCR-14[4], installed at waste boundary and screened in the uppermost aquifer. Screened intervals in each of the monitoring wells, range from 15 to 25 ft bgs.

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[4] Monitoring well CCR-10 was abandoned and replaced with CCR-10R on March 13, 2018 (Golder 2018a)

Groundwater in the surficial aquifer beneath the BSA has been documented to flow radially away from the BSA, with flow to the north toward Lake B, to the west toward Fish Lake, and to the east toward Lakes C and D (Figures 5 and 6). An area to the southwest of the BSA is hydraulically upgradient or side-gradient to the BSA, depending on site conditions that affect groundwater flow (e.g., surface water elevations, amount of precipitation, etc.), while the areas to the west, north and east are hydraulically downgradient of the BSA.

4.0 REGIONAL PHOSPHATE MINING

Land-pebble phosphate, hard-rock phosphate, and river-pebble phosphate are the three types of phosphatic ore found in Florida. The BSA is in one of the most productive areas of the land-pebble phosphate mining district. The land-pebble phosphate district was of economic interest not only to the minerals and fertilizer industry, but also to the United States Atomic Energy Commission (USAEC) during the twentieth century because land-pebble deposits contain a type of phosphate with elevated concentrations of uranium (Cathcart 1949). This section summarizes historic stratigraphy of mined land[5] near the BSA, uranium associated in the economic mining of calcium phosphate and aluminum phosphate zones, and the history of mining in the study area.

4.1 Historic Mining Related Stratigraphy

The stratigraphy near the BSA that was likely disturbed by historic mine activities, is presented below:

- Surface deposits consisted of windblown sand and swamp muck that range in thickness of up to 5 ft (Cathcart 1964).
- The Bone Valley Member[6] is divided into two distinct stratigraphic units, an upper unit of clayey sand and a lower phosphatic unit. The upper unit ranged in thickness from 0 to 25 ft and averaged about 8 ft (Cathcart 1964). It included light-colored clayey sand containing traces of phosphate nodules at the unit's base characterized by kaolinite and aluminum phosphate minerals.
- The contact between the upper and lower units of the Bone Valley Member is gradational over a few inches throughout most of the United States Geological Survey (USGS) Lakeland, Florida 7.5-minute quadrangle (Cathcart 1964). The lower unit ranges in thickness from minimal thickness to 35 ft, averages about 10 ft and contains most of the economic phosphate (Cathcart 1964). This unit is predominantly a clayey sand or a sandy clay, but beds of loose phosphate sand or fine-grained conglomerate are common. Beds of the lower unit locally contain phosphate nodules that range in size from fine sand to gravel (coarse pebble). The phosphate nodules are predominantly light colored—white, light brown and tan, gray; however, a few are amber or black.
- Due to mining, most of the Bone Valley sediments have been removed and reworked to recover phosphate. Mining in the vicinity of the BSA likely extended and stopped before, at, or slightly into the upper part of the Arcadia Formation, which underlies the Peace River Formation (Bone Valley Member). The upper portions of the Arcadia Formation consist of clayey sand and the lower portion of the formation is calcareous, and correlates to the upper portion of the intermediate confining unit at the site.

4.2 Uranium Associated with the Calcium Phosphate and Aluminum Phosphate Zones

The aluminum phosphate zone is formed by downward-percolating acidic water. The aluminum phosphate zone is not a stratigraphic unit but may include the various named and/or renamed beds/members of the Bone Valley strata. The physical and chemical characteristics of the zone vary.

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[5] Historic stratigraphic nomenclature differs from the regional/site geology included in Section 3 of this report.

[6] Later in the twentieth century the stratigraphic nomenclature was refined such that Bone Valley Formation isn't currently used, rather, the recent nomenclature includes Peace River Formation and its upper unit is the Bone Valley Member, both of which belong to the Hawthorn Group.

Typically, it is a white, light gray, tan, or gray-green clayey sand containing no visible phosphate except near the base, and in some areas the base of the zone is characterized by lumps, fragments, or beds of sandrock. According to Altschuler, Clarke, and Young (1958), the most completely leached part of the zone is characterized by the aluminum phosphate mineral wavellite, the less weathered parts by calcium aluminum phosphate minerals, and the unweathered part by the calcium phosphate mineral carbonate-rich fluorapatite. The principal clay mineral in the weathered (leached) parts is kaolinite, whereas montmorillonite is characteristic of the unweathered parts. The aluminum phosphate zone is high in uranium, which typically is concentrated in the finest (slime) fraction (Cathcart 1964).

The calcium phosphate zone within the Bone Valley Member underlies the aluminum phosphate zone. Both the aluminum phosphate and calcium phosphate zones are present at the borehole drilled in 1953 by the USAEC, at the 40-acre tract where the southern region of the BSA and the other 26 holes drilled in 1953 at the Lake Parker Tract (Cathcart 1964) (see Section 4.3 of this report). The calcium phosphate zone consists of unconsolidated sand, clayey sand, and sandy clay containing abundant nodules of calcium phosphate. The ore zone, referred to by miners as the matrix section, is contained with the calcium phosphate zone (Cathcart 1964). In general, the coarse phosphate fraction (+20 or +24 mesh) of the calcium phosphate zone contains less phosphorus pentoxide (P_2O_5) and generally more uranium than the fine phosphate fraction (-20 to +150 mesh), which is characteristic of the land-pebble phosphate district (Cathcart 1964). At the Lake Parker Tract (nearest the BSA), however, the coarse phosphate fraction contains more P_2O_5 than the fine fraction (Cathcart 1964). The following is based on the analyses the borehole drilled in 1953 by the USACE at the 40-acre tract where the southern portion of the BSA exists, in accordance with Cathcart (1964):

- Uranium is removed (leached) from the coarser (pebble and sand) fractions of the sample collected from approximately 17 to 26 ft below the 1953 ground surface,
- Uranium is concentrated to some degree in the fine slime fraction[7] of the same 17 to 26 ft bgs sample, and
- Uranium is highly concentrated in the pebble and slime fractions of the 26 to 30 ft bgs sample.

4.3 History of Mining in the Vicinity of the BSA

Mining for phosphate was active at several locations in the Lakeland Quadrangle from about 1914 through the 1980s. Some areas that were completely mined in the early twentieth century exist today as lakes, indicating that mining was likely hydraulic[8] instead of dragline (Cathcart 1964). Early mining, approximately three miles south of Lake Parker in the Pauway area, was by hydraulic methods for the pebble fraction only; later mining was by dragline for the overburden, but hydraulic monitors (water cannons) were used to move ore (Cathcart 1964). Some washer debris from early mine operations was in part re-mined (Cathcart 1964), but the technology at that time was insufficient at recovering the finer grain-size phosphate, thus finer materials were not recovered or were returned to the mine cut (Moudgil, 1992).

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[7] Slimes refers to fines, like silts/clays, passing a 150 mesh screen – less than approximately 0.1 millimeter in diameter. The fraction likely left behind and/or unmined at the BSA.

[8] Hydraulic mining is performed using high-pressure jets of water to dislodge rock material.

The American Cyanamid Co. operated its Saddle Creek Mine (T28S/R24E) from 1942 to 1957, and subsequently moved to the Orange Park Mine (Cathcart 1964). The Saddle Creek area was mined with draglines; both pebble and flotation concentrates[9] were recovered. The Orange Park Mine (T27S/R24E) started operating in April 1957 and was active in the 1960s (Cathcart 1964). Mining was by large draglines, flotation cells were used, and hydrocyclones[10] were used for primary desliming. Coronet Phosphate Co. began operation of its Tenoroc Mine (T27S/R24E) in 1951, and the mine continued to operate into the 1970s while the MPP was being developed. Mining at Tenoroc was for flotation concentrate and pebble; draglines were used to mine the overburden and phosphate (Cathcart 1964).

4.3.1 Lake Parker Tract

The Lake Parker tract included nearly 1,300 acres in portions of Sections 28 and 33: T27S/R24E, and Sections 3 and 4: T28S/R24E. The BSA, Fish Lake, and Lakes B, C, and D exist in portions of the same Sections. In 1953, the mining company, Coronet Phosphate Company, drilled 27 holes, under contract to the USAEC, at a spacing of 1 hole per 40-acre block (Cathcart 1964)[11]. The calcium phosphate zone, which includes the economic phosphate deposit, and the aluminum phosphate zone, which includes some possibly economic phosphate and concentrated uranium, are both present in all 27 holes in the Lake Parker tract. Relations of the two zones are graphically shown below.

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[9] Concentrate refers to the fine phosphate product, 1.17 mm to 0.104 mm in grain size. Material of this grain size is treated in flotation cells to separate the phosphate from the quartz sand. The phosphate product is the concentrate (Cathcart 1963, page 11).

[10] Hydrocyclones are typically funnel-shaped equipment used to separate materials by particle size.

[11] The Lake Parker tract had not been mined as of the 1964 reference publication date. The area that has recently become the Florida Fish and Wildlife Conservation Commission Teneroc Public Use Area (PUA) was extensively surface mined for phosphate through 1978. The western portion of the PUA was part of a wetland system associated with Lake Parker. The area that became Tenoroc was extensively surface-mined between 1950 and 1978 by the Coronet Phosphate Company, the Smith-Douglass Company, and Borden, Inc.

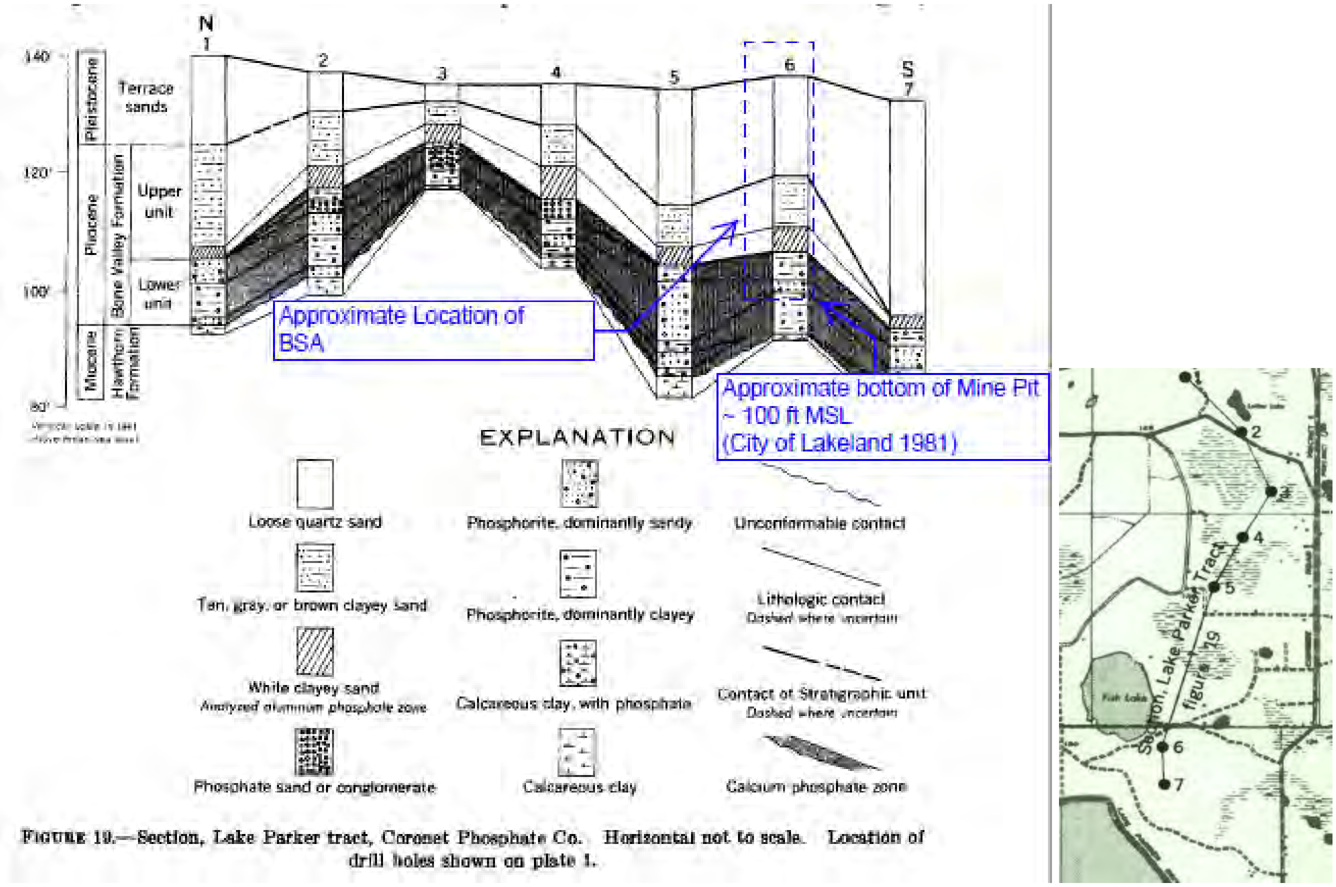

FIGURE 19.—Section, Lake Parker tract, Coronet Phosphate Co. Horizontal not to scale. Location of drill holes shown on plate 1.

Source for above base imagery: Cathcart 1964 – Image to the right of the section depicts approximate section/drill hole locations from Plate 1. Drill hole locations #6 and #7 are nearest the BSA location. Appendix B to this report includes a copy of the City of Lakeland 1981 Landfill Design Survey Drawing No. 229101.

Results of the analyses performed for the USAEC on samples collected in 1953 from the same 40-acre tract where the south region of the BSA exists are summarized below:

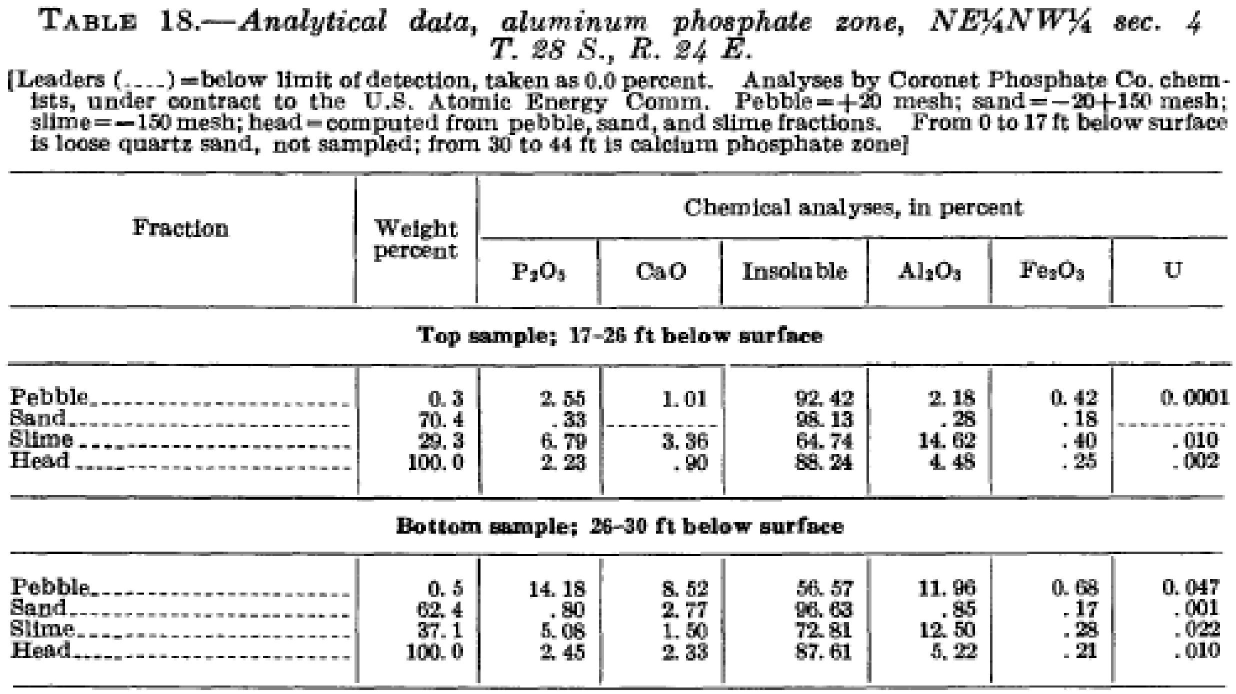

TABLE 18.—*Analytical data, aluminum phosphate zone, NE¼NW¼ sec. 4 T. 28 S., R. 24 E.*

[Leaders (----) = below limit of detection, taken as 0.0 percent. Analyses by Coronet Phosphate Co. chemists, under contract to the U.S. Atomic Energy Comm. Pebble = +20 mesh; sand = −20+150 mesh; slime = −150 mesh; head = computed from pebble, sand, and slime fractions. From 0 to 17 ft below surface is loose quartz sand, not sampled; from 30 to 44 ft is calcium phosphate zone]

Fraction	Weight percent	Chemical analyses, in percent					
		P_2O_5	CaO	Insoluble	Al_2O_3	Fe_2O_3	U
Top sample; 17-26 ft below surface							
Pebble	0.3	2.55	1.01	92.42	2.18	0.42	0.0001
Sand	70.4	.33	----------	98.13	.28	.18	----------
Slime	29.3	6.79	3.36	64.74	14.62	.40	.010
Head	100.0	2.23	.90	88.24	4.48	.25	.002
Bottom sample; 26-30 ft below surface							
Pebble	0.5	14.18	8.52	56.57	11.96	0.68	0.047
Sand	62.4	.80	2.77	96.63	.85	.17	.001
Slime	37.1	5.08	1.50	72.81	12.50	.28	.022
Head	100.0	2.45	2.33	87.61	5.22	.21	.010

Source for above: Cathcart 1964.

The Top sample (17 to 26 ft bgs) tabulated above is described as more thoroughly leached, has less calcium oxide (CaO) and uranium, and slightly less P_2O_5 than the Bottom sample (26 to 30 ft bgs); both have similar aluminum oxide (Al_2O_3) concentrations. The P_2O_5 content, originally as apatite (calcium phosphate), is dissolved and combines with alumina to form the relatively insoluble aluminum or calcium aluminum phosphate minerals. Uranium is not taken up by the aluminum phosphate minerals but combines with the calcium phosphate minerals. Uranium is removed from the coarser fractions of the top sample, is concentrated to some degree in the slime fraction[12] of the top sample and is highly concentrated in the pebble and slime fractions of the lower sample (Cathcart 1964).

4.3.2 Orange Park Mine

The Orange Park Mine consisted of two tracts of land: The Orange tract and the Park tract.

- The Orange tract included land in Section 28: T27S/R24E which includes the north portion of Lake B, which is adjacent to the BSA. Lake B extends into Section 28.
- The Park tract included land in Section 33: T27S/R24E, which includes portions of the BSA, Fish Lake, Lake B, and Lake C; and in Section 5: T28S/R24E, which includes portions of the MPP, Lake Parker, and Horseshoe Lake.

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[12] Slimes refers to fines, like silts/clays, passing 150 mesh screen – less than approximately 0.1 millimeter in diameter, which represent the fraction likely left behind and/or unmined at the BSA.

The American Cyanamid Company started mining in the Orange tract in 1957. In 1954, the company drilled 57 holes at the Orange tract and 33 holes at the Park tract, under contract to the USAEC, spaced one in each 40-acre tract in effort to cover most of the property.

In the southern part of the area (in the Park tract), the calcium phosphate zone averaged 9 ft in thickness and included rocks[13] of the Hawthorn Group, Bone Valley Member and/or Peace River Formation at almost every drill hole. The relations are depicted below: the calcium phosphate zone is entirely within the Hawthorn Group Peace River Formation at hole A (shown as Hawthorn Formation on log); at hole B, the calcium phosphate zone is divided about equally between the Hawthorn Group, Peace River Formation and Bone Valley Group (shown as Bone Valley Formation on log); and, at hole C, the calcium phosphate zone is entirely within the Bone Valley Group (Cathcart 1964).

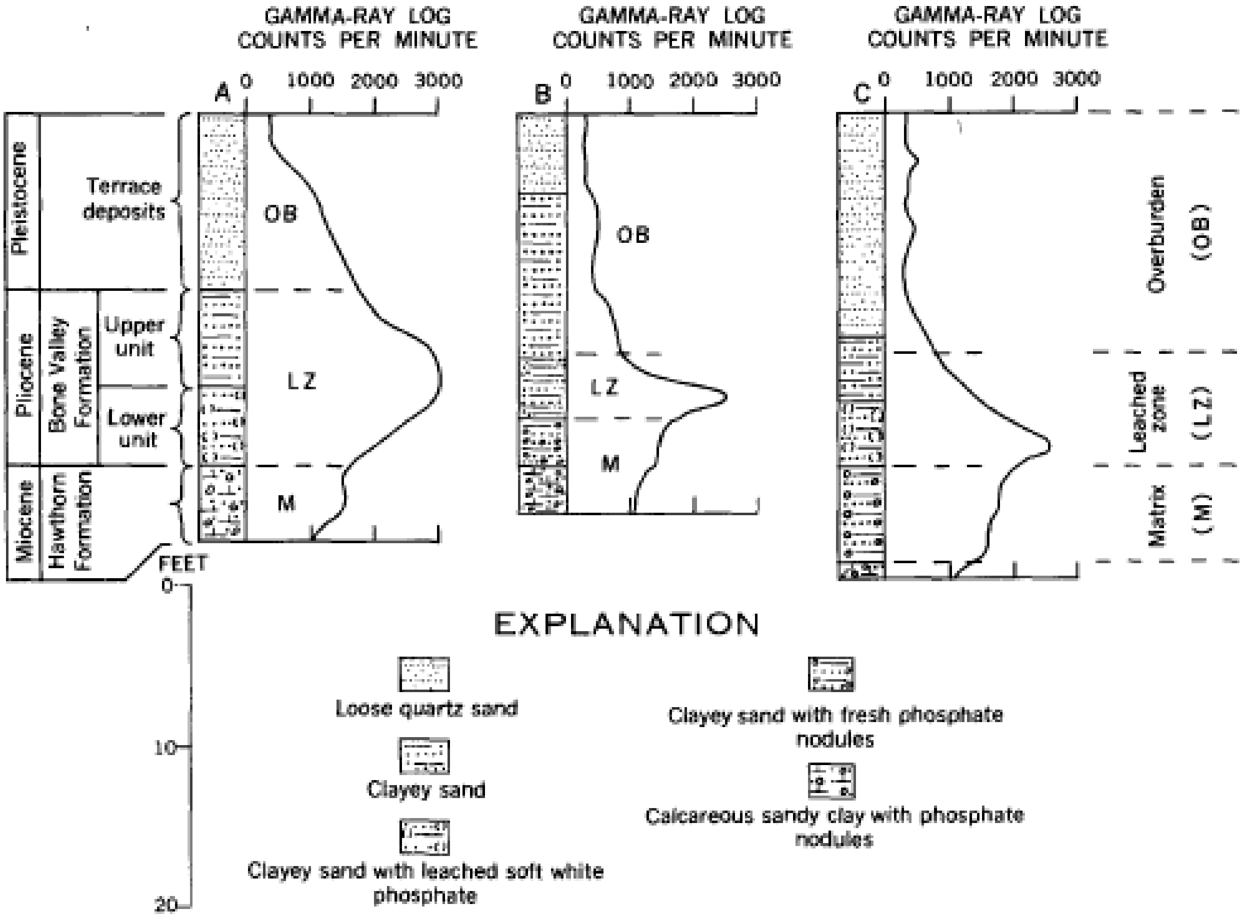

Figure 17.—Typical drill hole and gamma logs, Orange Park tract. Location of drill holes shown on plate 1.

Source for above: Page G86 Cathcart US Geologic Survey (USGS) 1964.

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[13] In more recent stratigraphic nomenclature, this rock mentioned by Cathcart (1964) likely limestone or dolomite, is likely phosphatic, would today likely be assigned to the Arcadia Formation of the Hawthorn Group.

4.3.3 Teneroc Mine

The Tenoroc Mine is located just east of the BSA with the nearest operations approximately one mile from the BSA in Section 34: T27S/R24E and Section 2 and/or 3: T28S/R24E. Mining by Coronet Phosphate Company started in 1951. In 1953, the company drilled 39 holes under contract to the USAEC. In an area of about 2,000 acres, the holes were drilled at a spacing of one in each 40 acres. One sample each of the aluminum phosphate zone and the calcium phosphate zone were collected at each drill hole and were analyzed. Select laboratory and drilling results for samples, including samples from the Teneroc Mine are listed in Tables 8 and 13 and Figure 18 from Cathcart 1964. The analytical data, screen data, and stratigraphic and economic geologic cross-section shown below further demonstrate the abundance of phosphate present in the study area.

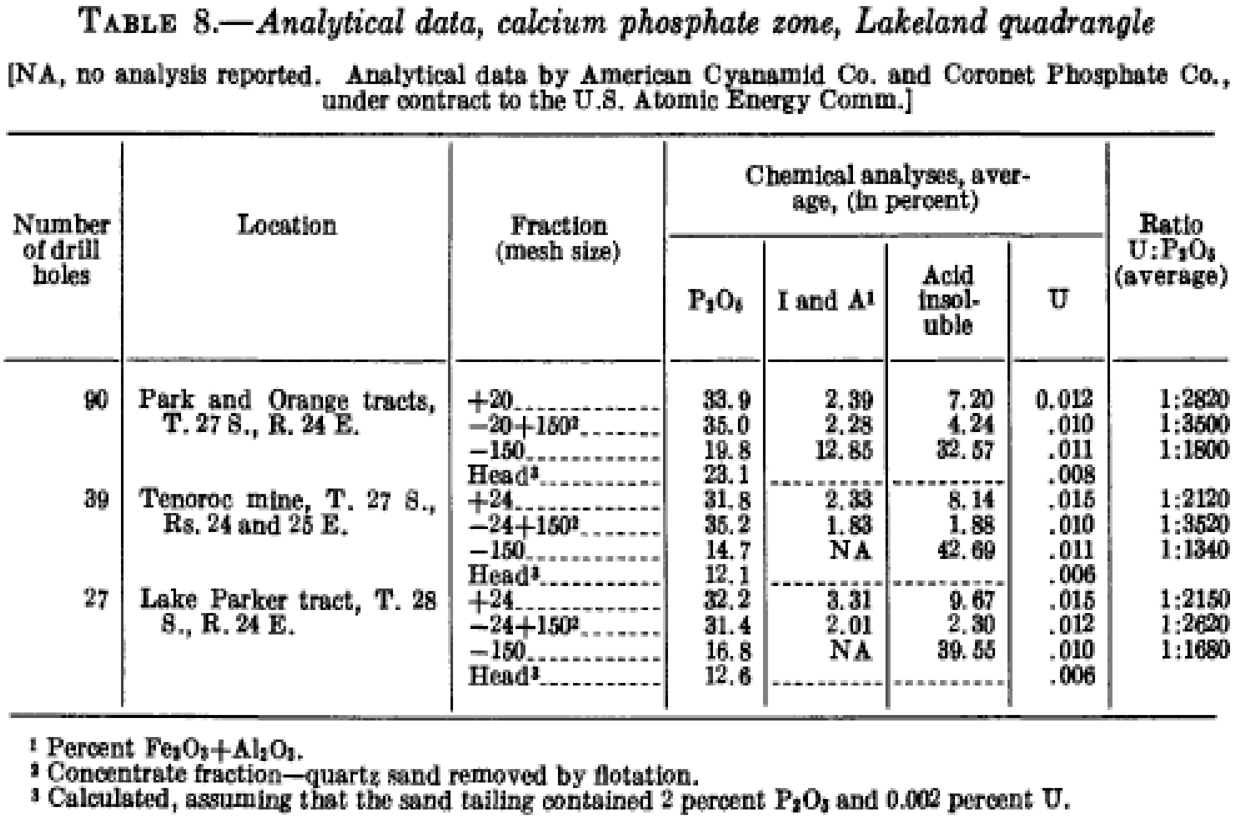


TABLE 8.—*Analytical data, calcium phosphate zone, Lakeland quadrangle*

[NA, no analysis reported. Analytical data by American Cyanamid Co. and Coronet Phosphate Co., under contract to the U.S. Atomic Energy Comm.]

Number of drill holes	Location	Fraction (mesh size)	Chemical analyses, average, (in percent)				Ratio U:P_2O_5 (average)
			P_2O_5	I and A[1]	Acid insoluble	U	
90	Park and Orange tracts, T. 27 S., R. 24 E.	+20	33.9	2.39	7.20	0.012	1:2820
		−20+150[2]	35.0	2.28	4.24	.010	1:3500
		−150	19.8	12.85	32.57	.011	1:1800
		Head[3]	23.1	-----	-----	.008	
39	Tenoroc mine, T. 27 S., Rs. 24 and 25 E.	+24	31.8	2.33	8.14	.015	1:2120
		−24+150[2]	35.2	1.83	1.88	.010	1:3520
		−150	14.7	NA	42.69	.011	1:1340
		Head[3]	12.1	-----	-----	.006	
27	Lake Parker tract, T. 28 S., R. 24 E.	+24	32.2	3.31	9.67	.015	1:2150
		−24+150[2]	31.4	2.01	2.30	.012	1:2620
		−150	16.8	NA	39.55	.010	1:1680
		Head[3]	12.6	-----	-----	.006	

[1] Percent $Fe_2O_3+Al_2O_3$.

[2] Concentrate fraction—quartz sand removed by flotation.

[3] Calculated, assuming that the sand tailing contained 2 percent P_2O_5 and 0.002 percent U.

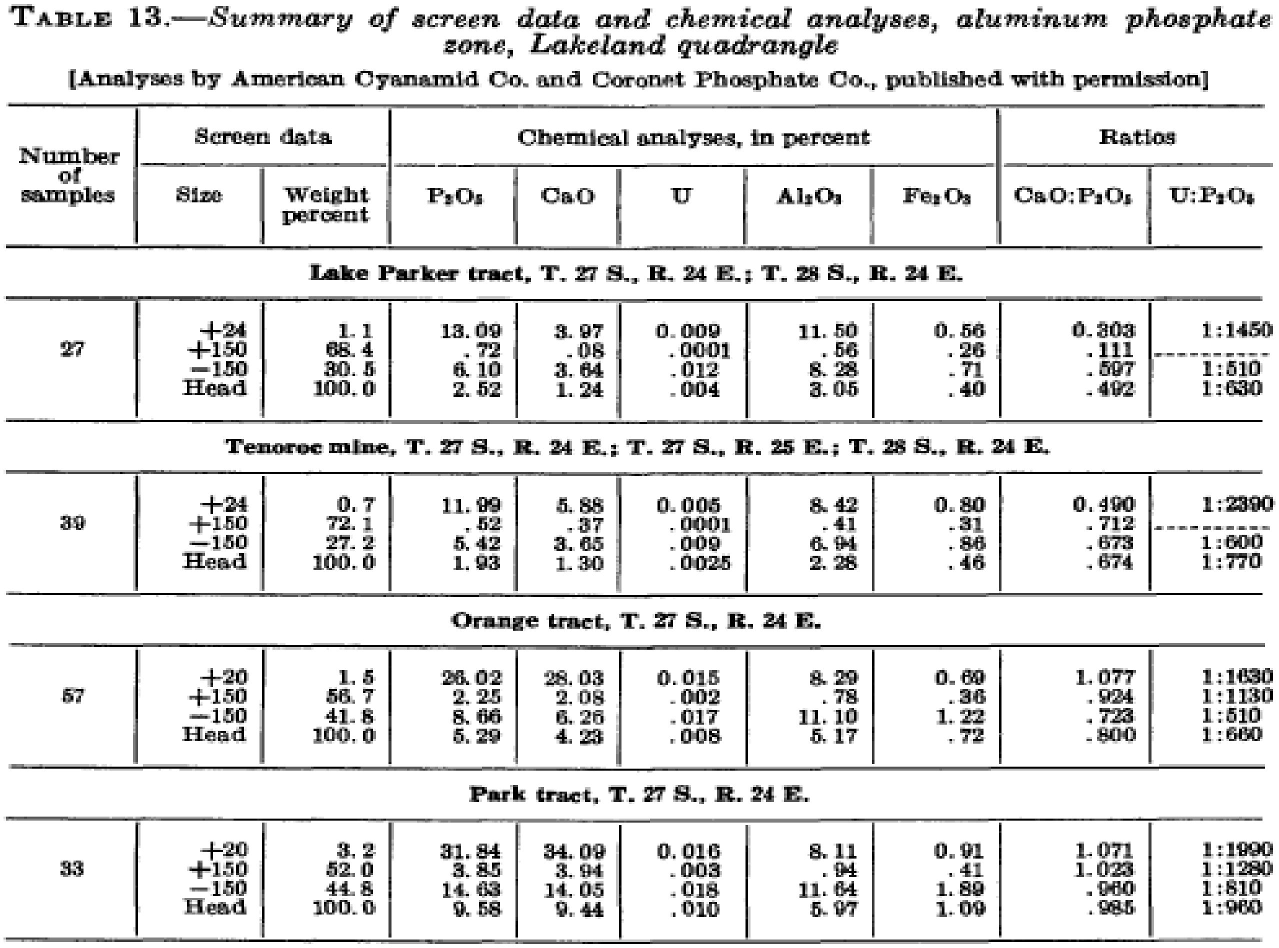


TABLE 13.—*Summary of screen data and chemical analyses, aluminum phosphate zone, Lakeland quadrangle*

[Analyses by American Cyanamid Co. and Coronet Phosphate Co., published with permission]

Number of samples	Screen data		Chemical analyses, in percent					Ratios	
	Size	Weight percent	P_2O_5	CaO	U	Al_2O_3	Fe_2O_3	$CaO:P_2O_5$	$U:P_2O_5$
Lake Parker tract, T. 27 S., R. 24 E.; T. 28 S., R. 24 E.									
27	+24	1.1	13.09	3.97	0.009	11.50	0.56	0.303	1:1450
	+150	68.4	.72	.08	.0001	.56	.26	.111	----------
	−150	30.5	6.10	3.64	.012	8.28	.71	.597	1:510
	Head	100.0	2.52	1.24	.004	3.05	.40	.492	1:630
Tenoroc mine, T. 27 S., R. 24 E.; T. 27 S., R. 25 E.; T. 28 S., R. 24 E.									
39	+24	0.7	11.99	5.88	0.005	8.42	0.80	0.490	1:2390
	+150	72.1	.52	.37	.0001	.41	.31	.712	----------
	−150	27.2	5.42	3.65	.009	6.94	.86	.673	1:600
	Head	100.0	1.93	1.30	.0025	2.28	.46	.674	1:770
Orange tract, T. 27 S., R. 24 E.									
57	+20	1.5	26.02	28.03	0.015	8.29	0.69	1.077	1:1630
	+150	56.7	2.25	2.08	.002	.78	.36	.924	1:1130
	−150	41.8	8.66	6.26	.017	11.10	1.22	.723	1:510
	Head	100.0	5.29	4.23	.008	5.17	.72	.800	1:660
Park tract, T. 27 S., R. 24 E.									
33	+20	3.2	31.84	34.09	0.016	8.11	0.91	1.071	1:1990
	+150	52.0	3.85	3.94	.003	.94	.41	1.023	1:1280
	−150	44.8	14.63	14.05	.018	11.64	1.89	.960	1:810
	Head	100.0	9.58	9.44	.010	5.97	1.09	.985	1:960

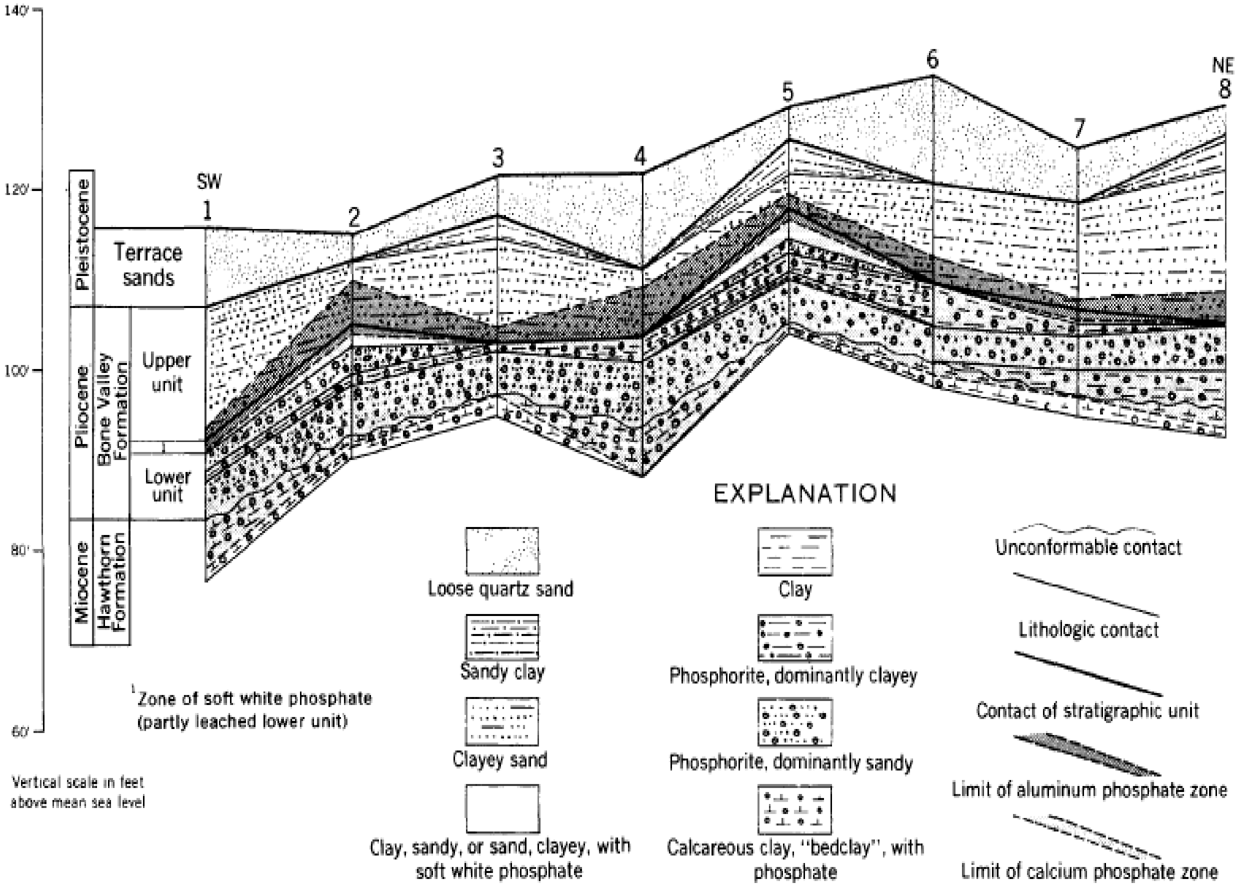


FIGURE 18.—Section, Tenoroc mine, showing relations of stratigraphy and economic geology. Horizontal not to scale. Location of drill holes shown on plate 1.

5.0 NATURALLY-OCCURING RADIONUCLIDE DISCUSSION

The following discussion provides information on the naturally-occurring radionuclides in the regional vicinity of the BSA:

- The Bone Valley Member contains high-grade phosphate rock in land-pebble form and is present and/or was mined just before construction of the BSA. In a report prepared for the USAEC, the USGS indicates the uranium occurrences in the Bone Valley Member were up to 0.1 percent (100 milligrams per kilogram or parts per million (ppm)) and are associated with the land pebble phosphate (Cathcart 1949).
- The BSA is located on former phosphate mined land which also included a mining pit/lake. The BSA and surrounding properties were mined in the early 1970s, at which time only coarser-grained pebble phosphate was recovered and the finer-grained (sand, silt, and clay) phosphate and associated minerals were left behind. An estimate of 20 to 30 percent of the phosphate (contained in the ore) is left behind with these finer-grained materials and/or returned to the mine cut or clay settling pond (Moudgil 1992). The mined land and lake were likely left behind with and/or infilled with these finer-grained material leftovers from mining and surrounding overburden.
- The southeastern coastal marine sediments of the Bone Valley Member contain naturally occurring phosphate minerals. Uranium and its decay products occur in significant quantities within these phosphate minerals and during the mid-1990s, 20 percent of the uranium produced in the United States was extracted from phosphate deposits in central Florida as a byproduct of fertilizer production (World Nuclear Association 2015).
- A typical Central Florida Phosphate district profile with average uranium concentrations listed per stratum is depicted below:

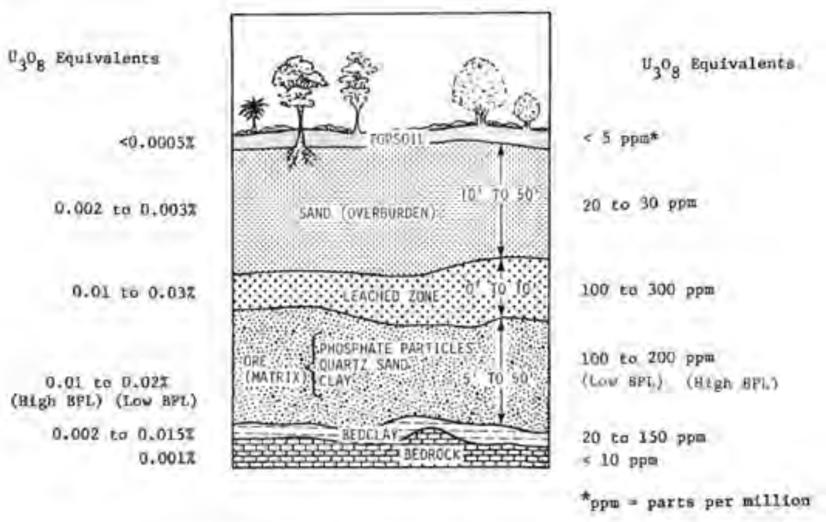


Figure 1.15. Average Uranium Concentrations as U_3O_8 (Altschuler et al 1956, Cathcart 1965, McKelvey 1956) in Typical Central Florida Phosphate District Profile (Fountain and Zellars 1972)

Source for above: Environmental Impact Statement: Central Florida Phosphate Industry: Volume II Background and Alternatives Assessment. EPA Nov 1978.

- Uranium in leached- and matrix-zones exhibits typical concentrations between 100 and 300 parts per million (ppm), which is approximately 1 to 2 orders of magnitude higher than U.S. coals and fly ash, respectively, as depicted below (USGS 1997, Figure 2):

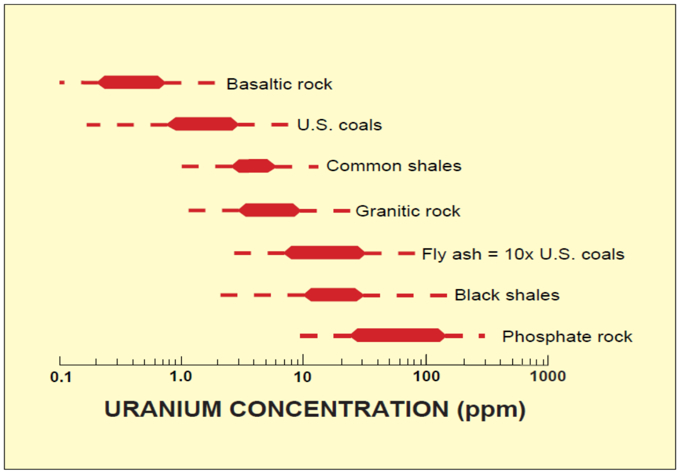
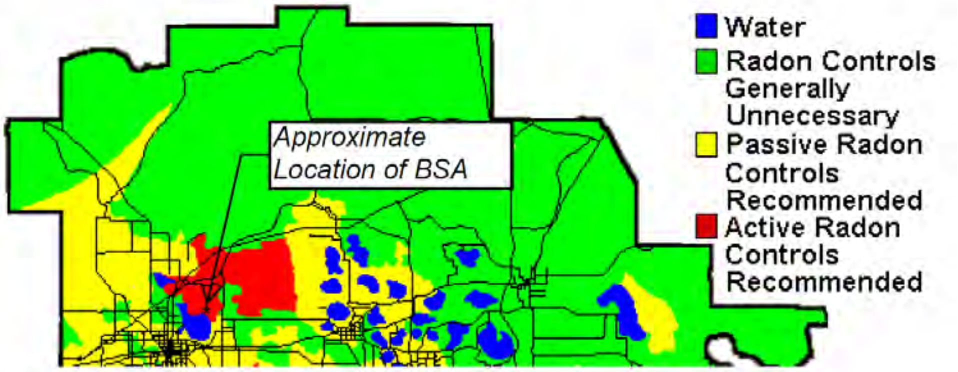


Figure 2. Typical range of uranium concentration in coal, fly ash, and a variety of common rocks.

Source of Figure 2 above: USGS 1997 Fact Sheet FS-163-97

- According to the Florida Department of Health (FDOH), the MPP is located in an area that is known to contain so much naturally-occurring radon, which is a daughter product of radium-226 decay, that the FDOH suggests buildings designed for construction on reclaimed mined land include active engineering controls in the effort to mitigate potential adverse health effects associated with human exposure to the natural radon gas. The following image is an excerpt from the Radon Protection Map for Polk County and depicts the approximate location of the BSA.



Source of above image of northern Polk County: http://www.floridahealth.gov/environmental-health/radon/maps/_images/POLK_LB.GIF (accessed November 16, 2018).

- Elevated levels of radon in structures built on reclaimed land suggest uranium and radium concentrations at shallow depths may be elevated relative to pre-mining levels. This is considered to occur when discarded fine-grained ore and leach zone materials are mixed with overburden materials as part of overall reclamation (Kaufman and Bliss 1977).
- Radon is a noble gas that sorbs little and does not participate in ion exchange; thus, its concentration can increase to high levels. Due to the short half-life (3.8 days) of radon-222, an abundance of radium-226 in subsurface materials is required to sustain high radon-222 levels (Miller 1985).
- Analysis by Miller (1985) suggests that a major fraction of radium-226 is released by alpha-particle recoil of thorium-230 or its precursors (uranium-234, protactinium-234, thorium-234, and uranium-238) to groundwater. Mineralized water competes with radium-226 for ion exchange and sorption sites and consequently results in elevated concentrations of dissolved radium-226. Miller contends that this process may explain the radium-226 concentrations present in groundwater in phosphate mining areas of Polk County.

6.0 AERIAL PHOTOGRAPHS AND TOPOGRAPHIC MAP SUMMARY

Based on Golder's review of documents including historic aerial photographs and topographic maps:

- The ground beneath BSA includes an area in the northeast region of the BSA identified as an abandoned phosphate pit (apparently the former southern finger of what is now identified as Lake B).
- Mining of the BSA and vicinity was active from 1971 through 1975.
- The western portion of the BSA likely was not mined as deep as other portions or at all due to mining limitations like pit side-slope stability setback considerations in proximity of surface water, roads, structures, etc., and therefore, phosphate matrix likely exists in these areas.

A summary of select historic aerial photographs and topographic maps reviewed is provided below. Appendix B provides copies of the photographs and maps:

Before the BSA:

- 1964 Plate 1 USGS Bulletin 1162-G (Cathcart 1964): includes approximate drill hole locations #6 and #7 along the Lake Parker Tract section line depicted in Section 4.3. of this report, drill hole locations #6 and #7 are nearest the BSA.
- 1968 Aerial Photograph: the east bank Horseshoe Lake is visible on the left side of the photograph. BSA vicinity prior to mining or site development activities.
- 1971 FDOT Aerial Photograph: An apparent dragline and perhaps pipelines are visible near the active mining just off the northeast corner of the BSA area.
- November 30, 1971 Aerial Photograph: Mining appears to be starting in the BSA area based on the ground surface appears to be stripped, and some tanks, pipelines, and/or a dragline is visible in the upper west area of the BSA near fish Lake.
- December 2, 1972 aerial photograph (on 1975 USGS Topographic Map): There is a region that appears to have been unmined and seems to have cast overburden at the western portion of the BSA south of Fish Lake between the visibly mined area and where the MPP generating area is now located and shore of Lake Parker, but some mining overburden may have been placed in this area. The mine pits appear to be holding water in the area where Lakes B, C, and D are currently located.
- 1973 Aerial Photograph (provided by Lakeland Electric with labels): Lake D appears to be undergoing mining. Some mine processing equipment appears to exist due south and near the bank of Fish Lake (near the approximate locations of monitoring wells CCR-13 and CCR-14).
- 1975 Aerial Photograph taken February 1, 1975 included on Map 2.1.1 Aerial Topographical Map dated 3/27/1978 for City of Lakeland MPP: mining appears to be recently active in the east and north areas of the BSA. South of the BSA and in the western/southernmost vicinity of the BSA the area is identified as, "Proposed Plant Boundary", and there is a region that appears to have been unmined and seems to have cast overburden at the western region of the BSA south of Fish Lake at the western region of the area between the visibly mined area and the MPP generating area and shore of Lake Parker.

- November 26, 1977 Aerial Photograph: Lakes B, C, and D created and left behind by the phosphate mining are visible. Mining does not appear to be actively ongoing in the photograph.

Post-Commencement of development of the Unit 3 at MPP:

- 1980 Aerial Photograph: Plant construction laydown roads (also drawn on the June 12, 1981 Existing Site Plan map) in the west area of the BSA are visible and some equipment/materials can be seen staged in this area. Lakes, including Lake B in the north BSA, created and left behind by the phosphate mining are visible.
- June 12, 1981 Existing Site Plan and April 7, 1981 Phase I Site Preparation Grading Plan for the City of Lakeland MPP landfill design: Topographic contours surveyed and depicted in the Lake B finger are labeled as abandoned phosphate mining pit in the BSA area. The pit appears to be approximately 20 ft deep with a base elevation of approximately 100 ft (USC&G Survey Datum).
- March 2, 1984 Aerial Photograph: A finger of Lake B, which is a manmade lake formed by mining, is visible in the BSA area. Lakes C and D, which were manmade by mining appear possibly interconnected.

7.0 SITE CHARACTERIZATION FOR RADIUM-226+228

The literature review for an ASD for radium-226+228 in groundwater is supported by data obtained from the February / March 2019 site characterization of and around the BSA, which was completed as part of the nature and extent investigation for radium-226+228, arsenic, and lithium SSLs in groundwater under the auspices of the assessment of corrective measures for the site. An assessment of corrective measures report will be included in the facility's operating records in accordance with §257.105(h)(10).

7.1 Field Investigation

Site characterization field investigation activities included an underground utility survey, collection of soil samples for a mineralogical assessment and chemical analysis, monitoring well installation and development, staff gauge installations, water-level data collection, and surface and groundwater sampling and analysis. Figure 4 presents locations of soil borings and monitoring wells installed and sampled as part of the site characterization.

Six boreholes were drilled using direct push technology (DPT) at locations adjacent to the CCR monitoring wells with radium-226+228 SSLs (CCR monitoring wells CCR-4, CCR-5, CCR-7, CCR-13, and CCR-14) and background CCR monitoring well CCR-2. These soil borings, designated CCR-2A, CCR-4A, CCR-5A, CCR-7A, CCR-13A, and CCR14A, were drilled to 30 ft bgs, and the soil boring logs are presented in Appendix C. Sixteen soil samples were collected from these six soil borings, ranging from 7 ft bgs to up to 29 ft bgs, for analysis. The soil samples are representative of the saturated uppermost aquifer downgradient of the BSA. A detailed mineralogical assessment of these 16 soil samples was conducted by Petrologic Solutions, Inc. under subcontract to Golder (see Section 7.2).

Nine soil borings were also advanced using DPT at proposed nature and extent monitoring well locations CCR-15 through CCR-23 to a depth of approximately 25 ft bgs. Soil samples were collected from these borings, as well as from soil boring CCR-4A, from approximately 24 ft bgs to 25 ft bgs and submitted, under chain-of-custody, for laboratory analysis of total uranium, iron, aluminum, arsenic, lithium, and phosphorus via EPA[14] Method 6020B, and for radium-226 and radium-228 via EPA Method 9315 and 9320, respectively, for samples from soil borings CCR-4A, CCR-15, CCR-16, CCR-18, CCR-22, and CCR-23. Soil samples were also collected from soil boring CCR-4A and from the soil borings advanced for the installation of nature and extent monitoring wells CCR-16 and CCR-20, from approximately 24 ft bgs to 25 ft bgs, and submitted, under chain-of-custody, for laboratory analysis of aluminum, arsenic, iron, and lithium via sequential extraction (EPA Method SW846 6010B SEP).

One shallow soil sample and one shallow sediment sample were also obtained from ground surface to 0.5 ft bgs. The soil sample, designated GSB-1, was collected east of the BSA and the sediment sample, designed Fish Lake-Sed, was collected from the bank of Fish Lake. Both samples were submitted under chain-of-custody for laboratory analysis. Soil sample GSB-1 was analyzed for total uranium, iron, aluminum, arsenic, lithium, and phosphorus via EPA Method 6020B and sediment sample Fish Lake-Sed was analyzed for total organic carbon via EPA Method Walkley-Black (USEA 2004a).

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[14] EPA: United States Environmental Protection Agency.

A larger-diameter borehole was drilled, using hollow-stem auger drilling techniques, at locations where soil borings where previously drilled using DPT, to facilitate the installation of nature and extent monitoring wells CCR-15 through CCR-23. The monitoring wells were constructed of 2-inch diameter, flush threaded schedule 40 polyvinyl chloride (PVC), bottom cap, 0.006-inch slotted, 10-foot screen, and riser section.

The borehole annulus was filled with 30-45 graded silica sand to approximately 2 feet above the top of the screen interval, with approximately 2 feet of 3/8-inch bentonite chips placed atop. The remaining annulus was filled from bottom to top via tremie method with a neat Portland cement grout to just below ground surface. Monitoring wells CCR-15 through CCR-22 were completed above-grade with locking well caps and aluminum protective casings set into 2-foot by 2-foot by 4-inch concrete pads. Bollards were installed around each monitoring well for visibility and damage protection. Monitoring well CCR-23 was installed below grade, in a flush-mounted well casing set into a rebar reinforced 2-foot by 2-foot by 4-inch concrete pad without bollards (the well is installed in an access road). The newly-installed nature and extent monitoring wells were surveyed for elevation (top of well casing) and location and staff gauges were installed in Fish Lake and Lakes B, C, and D for surface water level elevation. Table 1 presents a summary of monitoring well construction details.

After development of the newly-installed wells, groundwater was collected from nature and extent monitoring wells CCR-15 through CCR-23, MW-24S, MW-25S, and MW-26S. Surface water samples were also obtained from Fish Lake, and Lakes B, C, and D. Chemical/geochemical analysis of groundwater and surface water samples included field parameters and radionuclides, nutrients, and major cations and anions. The rationale and methods used are as follows:

Field Parameters: Parameters measured in the field included pH, dissolved oxygen, oxidation reduction potential (ORP), conductivity, and temperature. These parameters were used to evaluate general geochemical conditions in the groundwater and support geochemical modeling.

Metals: Analysis of Appendix III and IV metals and uranium to better understand the geochemical composition of groundwater and surface water. Metals analysis allows for the delineation of a potential plume, evaluation of mineral saturation indices, and evaluation of background contributions from natural sources or anthropogenic sources (USEPA 1998).

Radionuclides: Analysis of radium-226 and radium-228 to better understand the nature and extent of radium in groundwater and surface water and evaluation of background contributions from natural or anthropogenic sources (USEPA 2014).

Major Cations, Anions, and Nutrients: Geochemical modeling of mineral solubility, metals attenuation and background contributions requires analysis of major cations and anions because they affect and participate in sorption and mineral dissolution or precipitation reactions.

The groundwater samples were analyzed using the following methods:

- pH following SW846 9040C “pH Electrometric Measurement” (USEPA 2004b)
- Total dissolved solids standard method (SM) 2540C “Total Dissolved Solids Dried at 180°C” (USEPA 1993a)
- Total hardness following SM 2340B (USEPA 1997)
- Chloride, fluoride, and sulfide following USEPA SW846 9056A “Determination of Inorganic Anions by Ion Chromatography”, Revision 1 (USEPA 2007c)

- Nitrate and nitrite following EPA 353.2 “Determination of Nitrate-Nitrite Nitrogen by Automated Colorimetry, Revision 2.0” (USEPA 1993b)
- Alkalinity following SM 2320B “Alkalinity by Titration” (USEPA 2005a)
- Phosphorus following SM 4500-P E “Phosphorus by Ascorbic Acid Method” (USEPA 2005b)

7.2 Summary of Results for Radium-226+228

Table 2 presents a summary of soil and analytical results. Radium-226+228 detected in soil samples from soil borings advanced in the surficial aquifer around the BSA was measured in six samples (soil sample CCR-4A, CCR-15, CCR-16, CCR-18, CCR-22, and CCR-23) as were total uranium and total phosphorus. Radium-226+228 ranged from approximately 0.6 pCi/g (CCR-18) to 76.6 pCi/g (CCR-4A). The presence of radium-226+228 correlates to the presence of uranium in soil samples of the surficial aquifer with a coefficient of determination (R^2) of 0.99, while total uranium also correlates to total phosphorus in soil samples of the surficial aquifer with a coefficient of determination of 0.80 (Appendix D). Based on these correlations and the known consistency of typical CCR (USGS 1997), it is considered highly likely that the presence of radium is due to the decay of naturally-occurring uranium in soils.

Results from a March 2019 groundwater sampling event for radium-226+228 in groundwater collected from nature and extent monitoring wells CCR-15, CCR-16, CCR-18, CCR-22, CCR-23, MW-25S, and MW-26S and for radium-226+228 in surface water samples collected from Fish Lake and Lakes B, C, and D are presented on Figure 7 and the results are summarized in Table 3. Historical groundwater sampling results for radium-226+228, from CCR monitoring wells, from August 2016 through January 2019, are also included on Figure 7 and in Table 4.

Radium-226+228 concentrations in groundwater sampled in March 2019 ranged from 1.1 pCi/L to 42.7 pCi/L. The concentration of radium-226+228 was above the site-specific GWPS of 7.94 pCi/L (Golder 2018b) in groundwater samples collected from nature and extent monitoring wells CCR-15, CCR-16, and CCR-22. The concentration of radium-226+228 detected in the groundwater sample collected from nature and extent well CCR-16 was higher compared to the corresponding hydraulically upgradient CCR monitoring well CCR-5 (Figure 7). Radium-226+228 concentration in groundwater varies in the vicinity of the BSA, likely due to natural variability of radium-226+228 in soils as well as in the phosphatic mine tailings used to backfill the mined area where the BSA was constructed. Radium-226+228 in lake samples (Fish Lake and Lakes B, C, and D) ranged from 1.4 pCi/L in Fish Lake to 5.3 pCi/L[15] in Lake D. Given the radial pattern of groundwater flow away from the BSA (Figure 5 and 6), Fish Lake, and Lakes B, C, and D are downgradient receptors of groundwater flowing from the BSA, and the concentration of radium-226+228 detected in these water bodies is below the Florida surface water quality criteria of 5 pCi/L (Chapter 62-302.530, F.A.C.). Furthermore, based on historical groundwater data (August 2016 to January 2019) of samples collected from the CCR monitoring well network, radium-226+228 shows a stable or decreasing trend at each CCR monitoring well (Table 4).

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[15] Reported value meets State of Florida surface water quality criteria (Chapter 62-302.530, F.A.C.) for radium-226+228, in accordance with the rounding procedures described in the FDEP memorandum "Rounding Analytical Data for Site Rehabilitation Completion", dated November 17, 2011.

These soil and groundwater findings support the literature review indicating that the BSA and surrounding area are underlain by fine-grained phosphatic mine tailings and/or unmined phosphate deposits. Based on those findings, there is the high likelihood that radium-226+228 detected in groundwater is present as a product of the decay of a naturally-occurring uranium and thorium in soil and/or the mine tailings/phosphate deposits.

Further evidence for a naturally-occurring source for radium-226+228 in groundwater below and near the BSA is presented in a detailed mineralogical assessment of the underlying soils conducted by Petrologic Solutions, Inc. (Appendix E). The mineralogical assessment of soil samples included petrographic analysis, quantitative X-Ray Diffraction (XRD), Scanning Electron Microscopy (SEM), and additional bulk geochemistry. Results of the chemical and mineralogical assessment, coupled with Site and regional mineral resource evaluations, reveal the presence of naturally-occurring radioactive minerals associated with the phosphate ore mined at and near the BSA. These minerals include: eylettersite (thorium-bearing aluminum phosphate); wavellite (uranium-bearing aluminum phosphate); collophane, apatite, hydroxyapatite, and fluorapatite (uranium-bearing calcium phosphates) and zircon, rutile, and ilmenite (uranium-bearing oxides). As such, radium-226+228 present in groundwater below and in the vicinity of the BSA is considered to be naturally occurring and not due to a release from the BSA.

8.0 SUMMARY AND CONCLUSIONS

Radionuclides including radium-226 and radium-228 are naturally occurring in the study area and are associated with minerals in the phosphate matrix that was mined by the phosphate mining industry during the 1970s at the BSA prior to its construction. Radionuclides, including uranium, were detected in samples collected from approximately 26 to 30 ft bgs at the BSA during the 1950s. The upper portion of the phosphate matrix was mined in the north and west region of the BSA and phosphate matrix, tailings, and/or remnants, including the associated radionuclides, were left behind as backfill beneath the current BSA. Furthermore, a portion of the land beneath the BSA was likely not mined or partially mined, due to the proximity of the existing lakes, roads, and the MPP and therefore, phosphate ore likely exists in these areas. Based on the analysis presented in this report, uranium is most concentrated in the deeper phosphate bearing portions at the BSA site (e.g., approximately 26 to 30 ft bgs).

As previously presented, uranium concentrations in phosphate-bearing rocks exhibit typical uranium concentrations of up to 300 ppm, which is approximately 1 to 2 orders of magnitude higher than U.S. coals and fly ash, respectively (USGS 1997). The naturally occurring radionuclides in phosphate ore and mine tailings left behind underneath the BSA are conceivably at higher concentrations than CCR.

Findings of the geochemical assessments conducted for soil and groundwater at the site indicate that the BSA and surrounding area are underlain by fine-grained phosphatic mine tailings and/or unmined phosphate deposits. The concentration of radium-226+228 in groundwater in the vicinity of the BSA is shown to be variable, likely due to natural variations in soils as well as due to variations of radium-226+228 present in the phosphatic mine tailings used to backfill the mined area where the BSA was constructed. Furthermore, the detailed mineralogical assessment of the underlying soils conducted by Petrologic Solutions, Inc. reveal significant uranium and other accessory constituents associated with the phosphate ore mined at and near the BSA.

Therefore, based on the evidence presented herein, it is the opinion of Golder that radium-226+228 present in groundwater below and in the vicinity of the BSA is naturally occurring and not due to a release from the BSA.

9.0 PROFESSIONAL CERTIFICATION

This Alternative Source Demonstration for radium-226 and radium-228 in groundwater has been prepared for the Byproducts Storage Area at the C.D. McIntosh Power Plant, Lakeland, Florida. I hereby certify that the information contained in this report is accurate to the best of my knowledge as required by 40 CFR §257.95(g)(3)(ii).

Golder Associates Inc.

Samuel F. Stafford, P.E.

Florida Professional Engineer No. 78648

Certificate of Authorization No. 1670

Date 10 JUNE 2019

SAMUEL F. STAFFORD
No. 78648

10.0 SIGNATURE PAGE

Golder Associates Inc.

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Principal and Practice Leader

GAO/SFS/ALG/sjh

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TABLES

Table 1: **Summary of CCR Monitoring Well and Nature and Extent Monitoring Well Construction Details**
Byproduct Storage Area
Lakeland Electric - C.D. McIntosh Jr. Power Plant

Well ID	Date Installed	Northing (ft NAD83)	Easting (ft NAD83)	Ground Surface Elevation (ft NAVD88)	TOC Elevation (ft NAVD88)	Stick-up Height (ft ags)	Well Depth (ft bgs)	Screen Interval Depth (ft bgs)
CCR-1	6/24/2016	1362405.2	681287.1	138.3	141.30	3.0	25.7	15.7 - 25.2
CCR-2	6/23/2016	1362203.9	681787.6	137.6	140.57	3.0	25.8	15.7 - 25.2
CCR-3	6/23/2016	1362334.6	682451.3	137.5	137.04	-0.5	25.8	15.9 - 25.3
CCR-4	6/24/2016	1362450.0	683042.7	140.3	143.13	2.9	25.7	15.6 - 25.1
CCR-5	6/22/2016	1362716.0	683376.9	138.6	141.07	2.5	26.2	16.2 - 25.7
CCR-6	6/22/2016	1363168.4	683578.6	138.5	141.34	2.9	25.7	15.7 - 25.2
CCR-7	6/22/2016	1363631.9	683772.2	139.1	142.10	3.0	25.8	15.7 - 25.2
CCR-8	6/22/2016	1363917.6	683411.6	139.4	142.12	2.7	26.0	15.9 - 25.4
CCR-9	6/21/2016	1364085.2	683045.3	138.6	141.67	3.1	25.6	15.5 - 25.0
CCR-10 *	6/20/2016	1364309.4	682722.2	135.9	138.54	2.6	24.5	14.4 - 23.9
CCR-10R	3/13/2018	1364262.1	682706.3	133.8	133.56	-0.2	24.7	14.6 - 24.1
CCR-11	6/20/2016	1363835.4	682577.2	134.3	137.12	2.8	25.6	15.6 - 25.1
CCR-12	6/20/2016	1363353.1	682430.5	134.1	136.99	2.9	25.8	15.7 - 25.2
CCR-13	6/21/2016	1362936.6	682164.1	135.0	137.95	3.0	25.7	15.6 - 25.1
CCR-14	6/21/2016	1362771.1	681761.2	135.8	138.70	2.9	25.5	15.4 - 24.9
CCR-15	2/18/2019	1362341.3	683123.5	141.8	144.65	2.9	25.7	15.4 - 25.0
CCR-16	2/18/2019	1362533.2	683385.6	141.2	144.10	2.9	25.6	15.3 - 24.9
CCR-17	2/19/2019	1363019.9	683712.7	142.9	145.80	2.9	25.7	15.4 - 25.0
CCR-18	2/18/2019	1363631.1	683869.7	138.2	140.81	2.6	25.9	15.6 - 25.2
CCR-19	2/15/2019	1364205.4	683064.5	133.8	136.47	2.7	25.8	15.5 - 25.1
CCR-20	2/14/2019	1363855.5	682474.9	133.1	136.05	2.9	25.2	14.9 - 24.5
CCR-21	2/13/2019	1363454.0	682331.4	134.5	137.12	2.6	25.9	15.6 - 25.2
CCR-22	2/13/2019	1363017.4	682078.7	134.0	137.51	3.5	25.1	14.8 - 24.4
CCR-23	2/12/2019	1362812.1	681744.7	136.2	135.78	-0.5	25.4	15.1 - 24.7

Notes:

CCR Monitroing Wells are CCR-1 through CCR-14 and CCR-10R.

Nature and Extent Monitoring Wells are CCR-15 through CCR-23.

ft = feet

NAD83 = North American 1983 Datum

NAVD88 = North American Vertical Datum of 1988

ft bgs = feet below ground surface

ft ags = feet above ground surface

* Monitoring well CCR-10 was abandonend and replaced with CCR-10R on 3/13/2018.

Checked by: MSI 5/8/19
Reviewed by ALG 6/10/19

GOLDER

Table 2: Summary of Soil / Sediment Analytical Results
Byproduct Storage Area
Lakeland Electric - C.D. McIntosh Jr. Power Plant

Sample ID	Depth (ft bgs)	Date Sampled	Analyte									
			Aluminum (mg/Kg)	Arsenic (mg/Kg)	Iron (mg/Kg)	Lithium (mg/Kg)	Uranium (mg/Kg)	Phosphorus (mg/Kg)	Radium-226 (pCi/g)	Radium-228 (pCi/g)	Total Organic Carbon (%)	Fractional Organic Carbon (g/g)
CCR-4A	24-25	2/11/19	28,000 B	ND	2,800	ND	280 F1	130,000	75.9	0.726	NA	NA
CCR-15	24-25	2/18/19	8,000 B	ND	98	0.79 J	4.5	2,800	0.702	0.328	NA	NA
CCR-16	24-25	2/18/19	19,000 B	ND	450	2.9	4.3	3,000	1.14	1.07	NA	NA
CCR-17	24-25	2/19/19	5,900 B	ND	97	ND	0.92	1,000	NA	NA	NA	NA
CCR-18	24-25	2/15/19	2,600 B	ND	79	0.45 J	1.2	800	0.443	0.196 U	NA	NA
CCR-19	24-25	2/15/19	2,000 B	ND	62	ND	0.50	310	NA	NA	NA	NA
CCR-20	24-25	2/14/19	21,000 B	1.4 J	460	ND	40	11,000	NA	NA	NA	NA
CCR-21	24-25	2/13/19	1,800 B	ND	110	ND	0.51	210	NA	NA	NA	NA
CCR-22	24-25	2/12/19	96,000 B	ND	8,400	15	280	90,000	65.2	1.49	NA	NA
CCR-23	24-25	2/12/19	20,000 B	3.9 J	4,400	4.8 J	58	78,000	14.7	0.359	NA	NA
GSB-1	0-0.5	2/21/19	4,000 B	1.4 J	1,200	ND	21	21,000	NA	NA	NA	NA
Fish Lake - Sed	0-0.5	2/20/19	N/A	NA	NA	NA	NA	NA	NA	NA	1.300	0.013

Notes:

ft bgs = feet below ground surface

mg/Kg = milligrams per kilogram

pCi/g = picocuries per gram

g/g = gram per gram

B - Compound was found in the blank and sample.

F1 - Matrix Spike/Matrix Spike duplicate (MS/MSD) Recovery is outside acceptance limits, and the concentration is an approximate value. Sample matrix interference and/or non-homogeneity are suspected because the associated laboratory control sample recovery was within acceptable limits.

J - Result is less than the reporting limit (RL) but greater than or equal to the method detection limit (MDL) and the concentration is an approximate value.

U - Result is less than the sample detection limit.

ND - Not detected

NA - Not analyzed

Checked by: SJH 5/23/19
Reviewed by: ALG 6/10/19

Table 3: Summary of Radium 226 & 228 in Nature and Extent Groundwater and Suface Water
Byproduct Storage Area
Lakeland Electric - C.D. McIntosh Jr. Power Plant

Monitoring Well / Surface Water	Date Sampled	Radium 226 (pCi/L)	Radium 228 (pCi/L)	
CCR-15	3/7/19	19.2	5.9	
CCR-16	3/6/19	23.3	19.4	
CCR-17	3/6/19	NA	NA	
CCR-18	3/6/19	0.5	0.7	U
CCR-19	3/6/19	NA	NA	
CCR-20	3/7/19	NA	NA	
CCR-21	3/7/19	NA	NA	
CCR-22	3/7/19	26.3	1.4	
CCR-23	3/7/19	6.5	0.8	
MW-24S	3/5/19	NA	NA	
MW-25S	3/6/19	0.5	0.7	U
MW-26S	3/5/19	0.5	0.6	U
Fish Lake	3/11/19	0.7	0.7	U
Lake B	3/11/19	1.6	0.8	U
Lake C	3/13/19	1.5	0.7	U
Lake D	3/13/19	4.0	1.3	

Notes:
Radium concentrations reported in picocuries per liter (pCi/L)
U - Result is less than the sample detection limit
NA - Not Analyzed

Checked by: SJH 5/10/19
Reviewed by: ALG 6/10/19

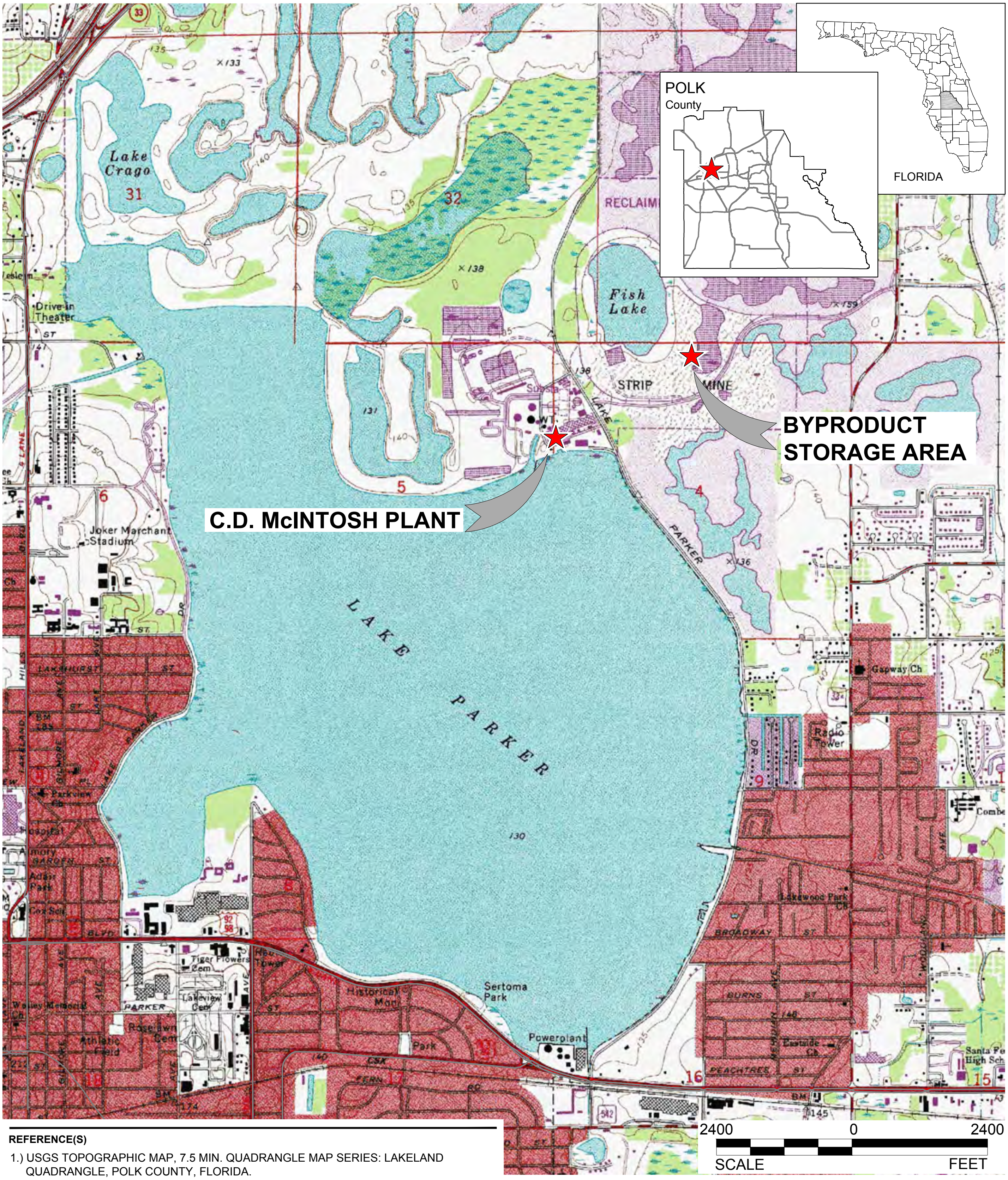
Table 4: Summary of Radium 228 & 228 Concentrations in Groundwater (CCR Monitoring Wells)
Byproduct Storage Area
Lakeland Electric - C.D. McIntosh Jr. Power Plant

Event	Date Sampled	CCR Monitoring Well Designation													
		CCR-1	CCR-2	CCR-3	CCR-4	CCR-5	CCR-6	CCR-7	CCR-8	CCR-9	CCR-10 / CCR-10R*	CCR-11	CCR-12	CCR-13	CCR-14
Background	8/4/2016	3.23	8.84	24.7	39.7	18.7	9.71	7.24	22	3.77	2.79	9.21	3	29.7	25.7
Background	9/14/2016	3.97	4.96	6.91	41	18	7.63	12.8	3.99	20.6	3.02	10.4	2.75	0.629	30.7
Background	10/12/2016	4.07	6.55	6.11	47.8	18.6	4.9	6.83	4.32	20.1	1.93	11.4	2.84	70.2	28.4
Background	11/2/2016	4.71	6.52	6.7	48.2	17	3.7	5.9	3.71	21.4	1.28	8.05	3.06	74.6	27
Background	12/14/2016	5.42	4.56	7.05	77.3	19.3	5.77	14.1	5.84	22.2	1.64	10.6	2.87	85.7	42.1
Background	1/11/2017	5.02	5.83	6.19	82.2	19.5	5.81	17.9	5.56	21.7	2.01	10.6	2.37	81.4	36.4
Background	2/1/2017	4.31	5.73	5.61	71.7	16.2	6.07	16.3	7.37	18.4	1.18	9.13	2.48	70.9	35.8
Background	3/15/2017	4.39	6.07	4.43	59	16.2	6.53	15.1	8.77	14.4	1.58	5.89	2.68	60.9	29.4
Background	4/12/2017	4.62	5.54	4.62	66.8	16	7.3	19.4	9.28	15.3	1.5	7.78	2.11	52.6	32.4
Background	5/17/2017	3.58	5.07	3.81	71.1	13.8	8.53	20.6	7.32	13.5	1.38	8.93	2.01	30.3	24.8
Background	6/13/2017	4.87	5.24	3.87	56.4	16.4	6.58	17.3	4.27	18.2	1.15	10.2	3.19	8.98	42.2
Background	7/11/2017	4.59	4.54	5.02	71.9	15.9	6.86	12.3	4.41	14.4	1.02	7.11	2.46	5.06	35.1
Background	8/15/2017	5.65	2.41	4.17	61.7	17.2	4.05	4.93	5.27	15.5	0.864	7.99	2.55	36.2	28.2
Detection	10/13/2017	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Detection	11/30/2017	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Detection	12/7/2017	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Assessment	4/12/2018	6.6	5.8	3.9	45.8	18.8	4.8	11.7	6.4	0.86	3.6	1.3	3	57.4	23.3
Assessment	7/18/2018	6.8	3.2	4.1	51	21.1	2.9	2.9	5.5	9.1	2.7	6.1	3.6	40.6	17.5
Assessment	1/8/2019	6.8	2.8	4.6	38.2	13.3	2.3	7.2	4.8	11.1	3.4	4.8	4.8	69.3	23.0

Notes:
Dates shown are represntative of sampling events that took place over multiple days
Radium values represent sum of Radium 226 and Radium 228
All concentrations reported in picocuries per liter (pCi/L)
NA - Not analyzed
* Monitoring well CCR-10 was abandonend and replaced with CCR-10R on 3/13/2018

Checked by: SJH 5/10/19
Reviewed by: ALG 5/24/2019

FIGURES



REFERENCE(S)

1.) USGS TOPOGRAPHIC MAP, 7.5 MIN. QUADRANGLE MAP SERIES: LAKELAND QUADRANGLE, POLK COUNTY, FLORIDA.

CLIENT
LAKELAND ELECTRIC

PROJECT
BSA CCR GROUNDWATER
C.D. McINTOSH POWER PLANT
LAKELAND, POLK COUNTY, FLORIDA

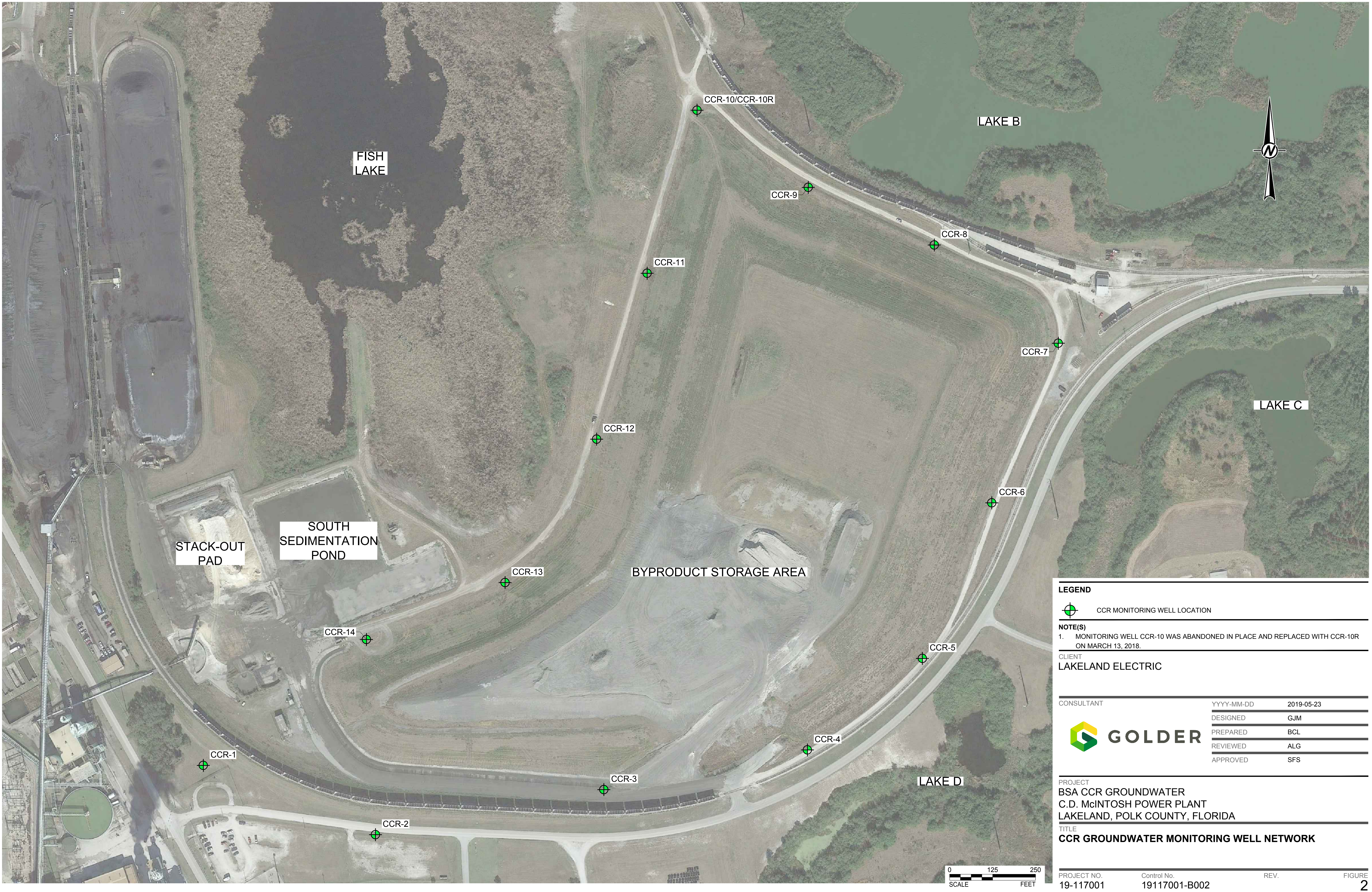
CONSULTANT

GOLDER

YYYY-MM-DD	2019-01-08
DESIGNED	SFS
PREPARED	BCL
REVIEWED	ALG
APPROVED	SFS

TITLE
SITE LOCATION MAP

PROJECT NO.	Control No.	REV.	FIGURE
19-117001	1895370-B001		1



LEGEND

⊕ CCR MONITORING WELL LOCATION

NOTE(S)

1. MONITORING WELL CCR-10 WAS ABANDONED IN PLACE AND REPLACED WITH CCR-10R ON MARCH 13, 2018.

CLIENT
LAKELAND ELECTRIC

CONSULTANT
GOLDER

YYYY-MM-DD	2019-05-23
DESIGNED	GJM
PREPARED	BCL
REVIEWED	ALG
APPROVED	SFS

PROJECT
BSA CCR GROUNDWATER
C.D. McINTOSH POWER PLANT
LAKELAND, POLK COUNTY, FLORIDA

TITLE
CCR GROUNDWATER MONITORING WELL NETWORK

PROJECT NO.	Control No.	REV.	FIGURE
19-117001	19117001-B002		2

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0 1 in IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B

LEGEND

🟦	SURFACE WATER SURROUNDING BYPRODUCT STORAGE AREA
⬚	APPROXIMATE EXTENT OF BYPRODUCT STORAGE AREA
△	STAFF GAUGE

NOTE(S)

1. ALL LOCATIONS ARE APPROXIMATE

CLIENT
LAKELAND ELECTRIC

CONSULTANT
GOLDER

YYYY-MM-DD	2019-05-23
DESIGNED	MSI
PREPARED	MSI
REVIEWED	ALG
APPROVED	SFS

PROJECT
BSA CCR GROUNDWATER
C.D. McINTOSH POWER PLANT
LAKELAND, POLK COUNTY, FLORIDA

TITLE
SURFACE WATER BODIES SURROUNDING BYPRODUCT STORAGE AREA

DRAFT

PROJECT NO.	Control No.	REV.	FIGURE
19117001	19117001-A001		3

Path: \\tampa\cad\PROJECTS\2019 PROJ\19-117001 Lakeland Elec\A - March2019 Data\Active Drawings\ | File Name: 19117001-A001.dwg

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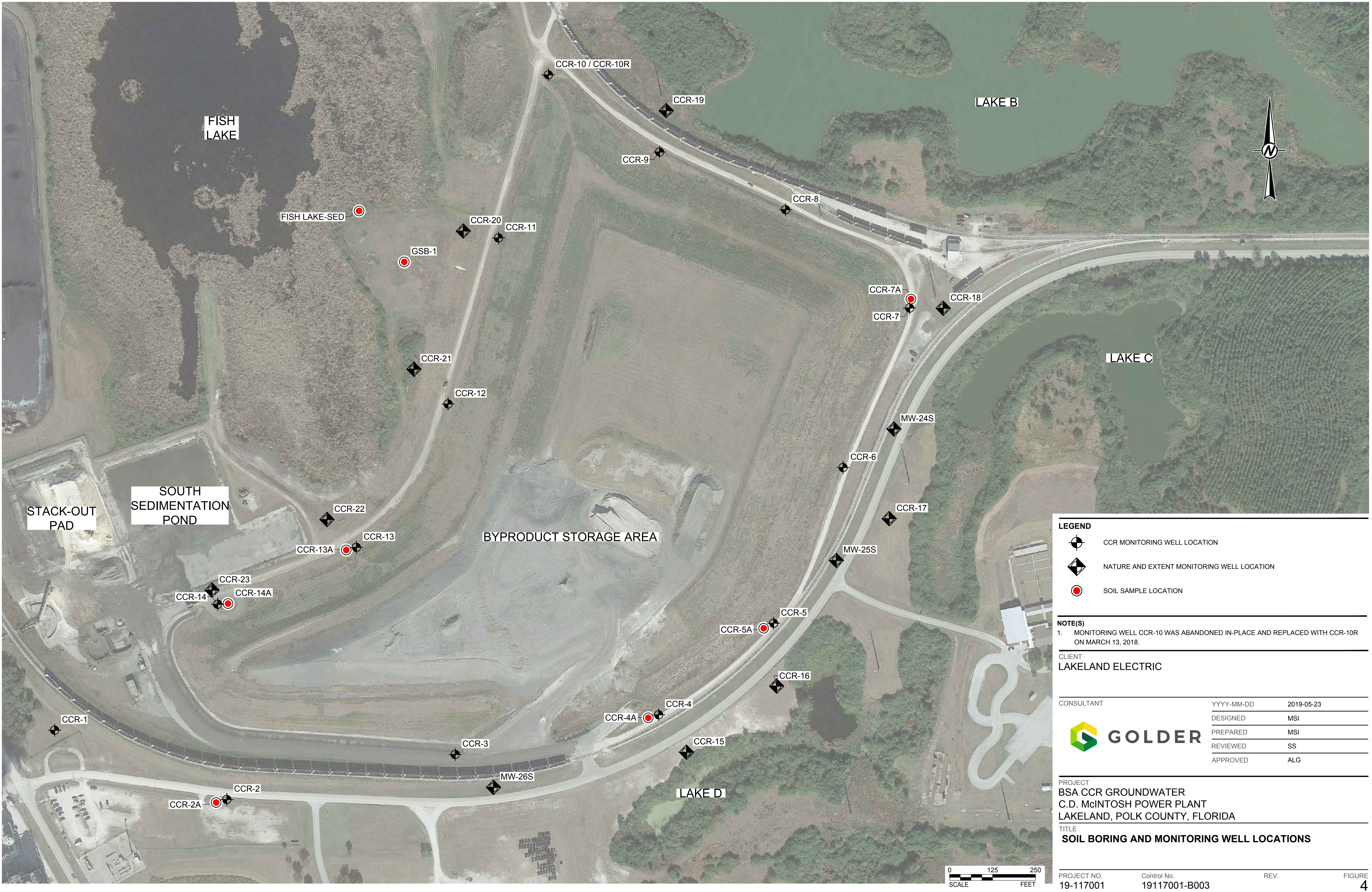
IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B



LEGEND

⊕ CCR MONITORING WELL LOCATION

◆ NATURE AND EXTENT MONITORING WELL LOCATION

● SOIL SAMPLE LOCATION

NOTE(S)

1. MONITORING WELL CCR-10 WAS ABANDONED IN-PLACE AND REPLACED WITH CCR-10R ON MARCH 13, 2018.

CLIENT
LAKELAND ELECTRIC

CONSULTANT
GOLDER

YYYY-MM-DD	2019-05-23
DESIGNED	MSI
PREPARED	MSI
REVIEWED	SS
APPROVED	ALG

PROJECT
BSA CCR GROUNDWATER
C.D. McINTOSH POWER PLANT
LAKELAND, POLK COUNTY, FLORIDA

TITLE
SOIL BORING AND MONITORING WELL LOCATIONS

PROJECT NO.	Control No.	REV.	FIGURE
19-117001	19117001-B003		4

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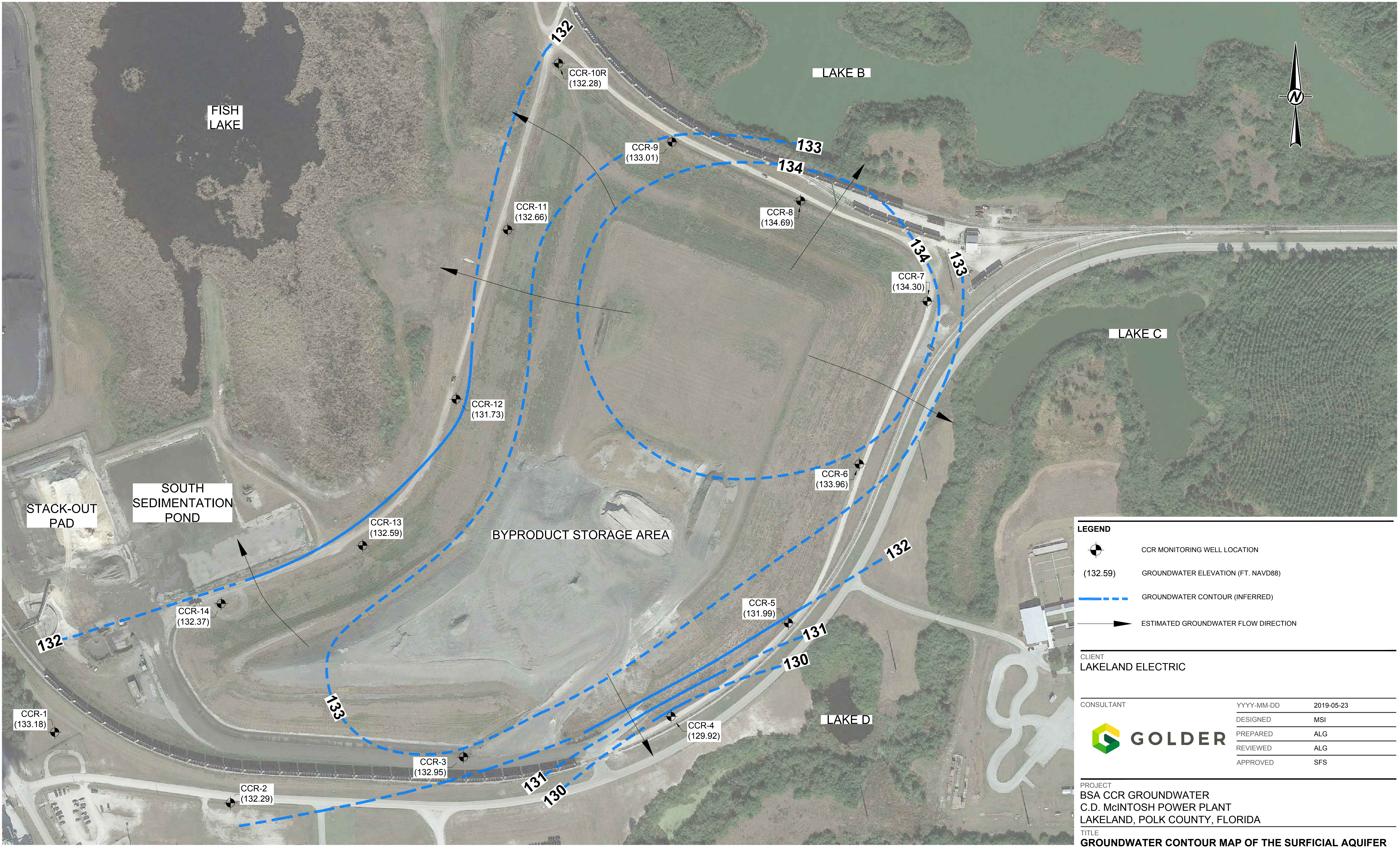
1 in



LEGEND

⯐	CCR MONITORING WELL LOCATION
(132.59)	GROUNDWATER ELEVATION (FT. NAVD88)
‒ ‒ ‒	GROUNDWATER CONTOUR (INFERRED)
⟶	ESTIMATED GROUNDWATER FLOW DIRECTION

CLIENT
LAKELAND ELECTRIC

CONSULTANT

GOLDER

YYYY-MM-DD	2019-05-23
DESIGNED	MSI
PREPARED	ALG
REVIEWED	ALG
APPROVED	SFS

PROJECT
BSA CCR GROUNDWATER
C.D. McINTOSH POWER PLANT
LAKELAND, POLK COUNTY, FLORIDA

TITLE
GROUNDWATER CONTOUR MAP OF THE SURFICIAL AQUIFER (JULY 16, 2018)

PROJECT NO.	Control No.	REV.	FIGURE
19-115694	19117001-B004		5

Path: \\tampa\cad\PROJECTS\2019 PROJ\19-117001 Lakeland Elec\A - March2019 Data\Active Drawings\ | File Name: 19117001-B004.dwg

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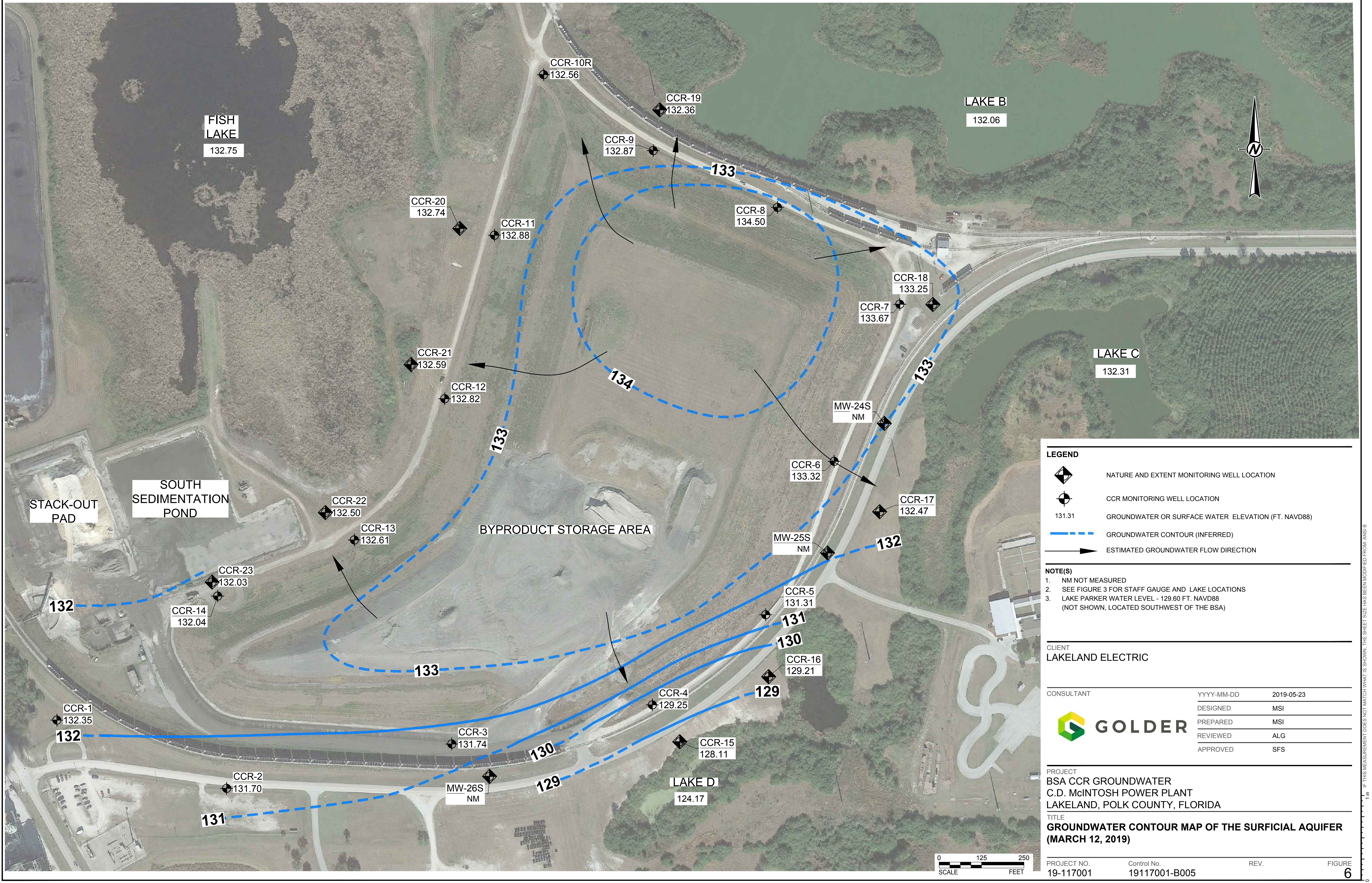

LEGEND

◆ NATURE AND EXTENT MONITORING WELL LOCATION

⊕ CCR MONITORING WELL LOCATION

131.31 GROUNDWATER OR SURFACE WATER ELEVATION (FT. NAVD88)

- - - GROUNDWATER CONTOUR (INFERRED)

→ ESTIMATED GROUNDWATER FLOW DIRECTION

NOTE(S)

1. NM NOT MEASURED
2. SEE FIGURE 3 FOR STAFF GAUGE AND LAKE LOCATIONS
3. LAKE PARKER WATER LEVEL - 129.60 FT. NAVD88 (NOT SHOWN, LOCATED SOUTHWEST OF THE BSA)

CLIENT
LAKELAND ELECTRIC

CONSULTANT
GOLDER

YYYY-MM-DD	2019-05-23
DESIGNED	MSI
PREPARED	MSI
REVIEWED	ALG
APPROVED	SFS

PROJECT
BSA CCR GROUNDWATER
C.D. McINTOSH POWER PLANT
LAKELAND, POLK COUNTY, FLORIDA

TITLE
GROUNDWATER CONTOUR MAP OF THE SURFICIAL AQUIFER (MARCH 12, 2019)

PROJECT NO.	Control No.	REV.	FIGURE
19-117001	19117001-B005		6

Path: \\tampa\cad\PROJECTS\2019 PROJ\19-117001 Lakeland Elec\A - March2019 Data\Active Drawings\ | File Name: 19117001-B005.dwg

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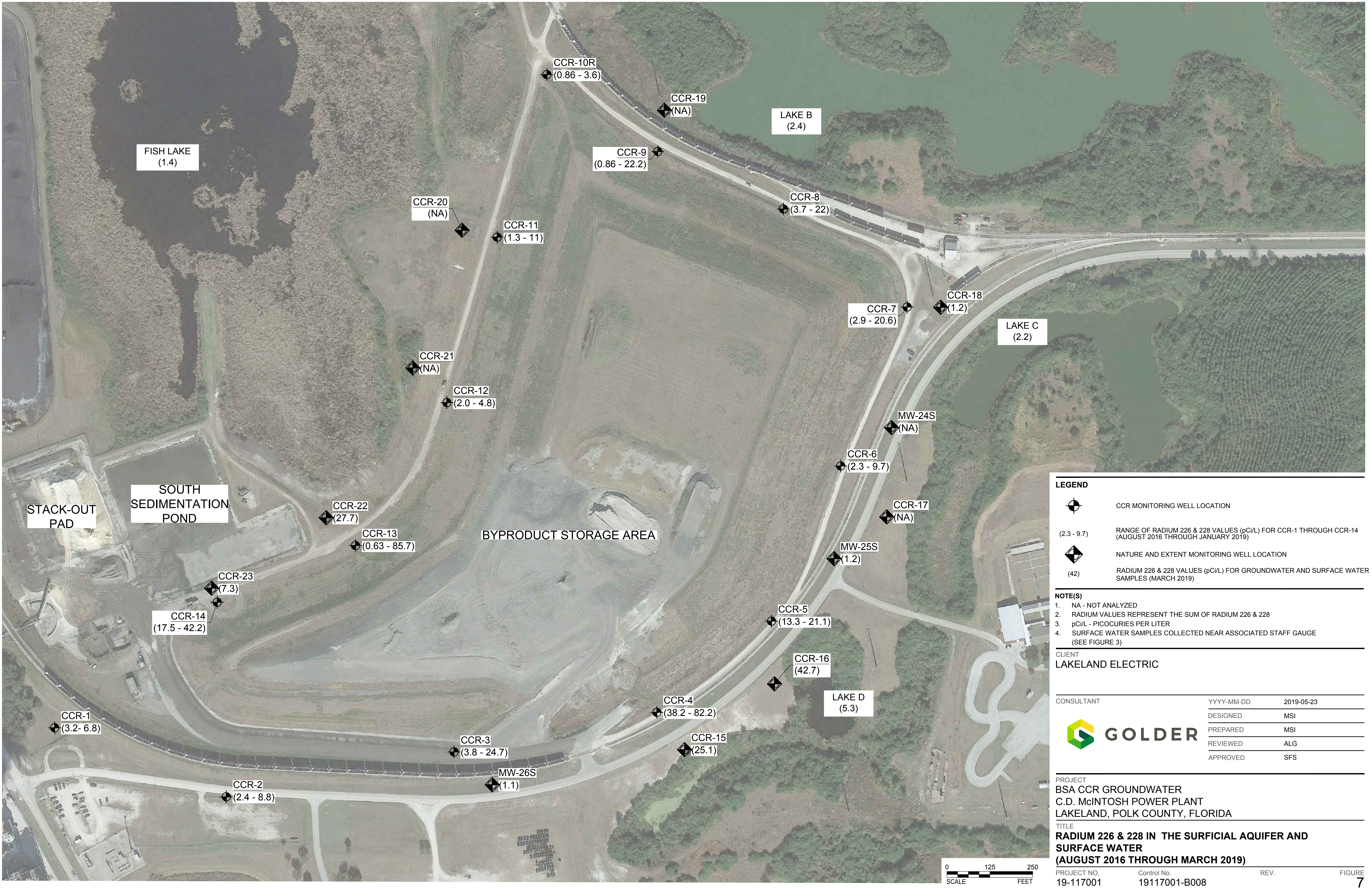

LEGEND

⊕	CCR MONITORING WELL LOCATION
(2.3 - 9.7)	RANGE OF RADIUM 226 & 228 VALUES (pCi/L) FOR CCR-1 THROUGH CCR-14 (AUGUST 2016 THROUGH JANUARY 2019)
◆	NATURE AND EXTENT MONITORING WELL LOCATION
(42)	RADIUM 226 & 228 VALUES (pCi/L) FOR GROUNDWATER AND SURFACE WATER SAMPLES (MARCH 2019)

NOTE(S)

1. NA - NOT ANALYZED
2. RADIUM VALUES REPRESENT THE SUM OF RADIUM 226 & 228
3. pCi/L - PICOCURIES PER LITER
4. SURFACE WATER SAMPLES COLLECTED NEAR ASSOCIATED STAFF GAUGE (SEE FIGURE 3)

CLIENT
LAKELAND ELECTRIC

CONSULTANT
GOLDER

YYYY-MM-DD	2019-05-23
DESIGNED	MSI
PREPARED	MSI
REVIEWED	ALG
APPROVED	SFS

PROJECT
BSA CCR GROUNDWATER
C.D. McINTOSH POWER PLANT
LAKELAND, POLK COUNTY, FLORIDA

TITLE
RADIUM 226 & 228 IN THE SURFICIAL AQUIFER AND SURFACE WATER (AUGUST 2016 THROUGH MARCH 2019)

PROJECT NO.	Control No.	REV.	FIGURE
19-117001	19117001-B008		7

Path: \\tampa\cad\PROJECTS\2019 PROJ\19-117001 Lakeland Elec\A - March2019 Data\Active Drawings\ | File Name: 19117001-B008.dwg

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI B

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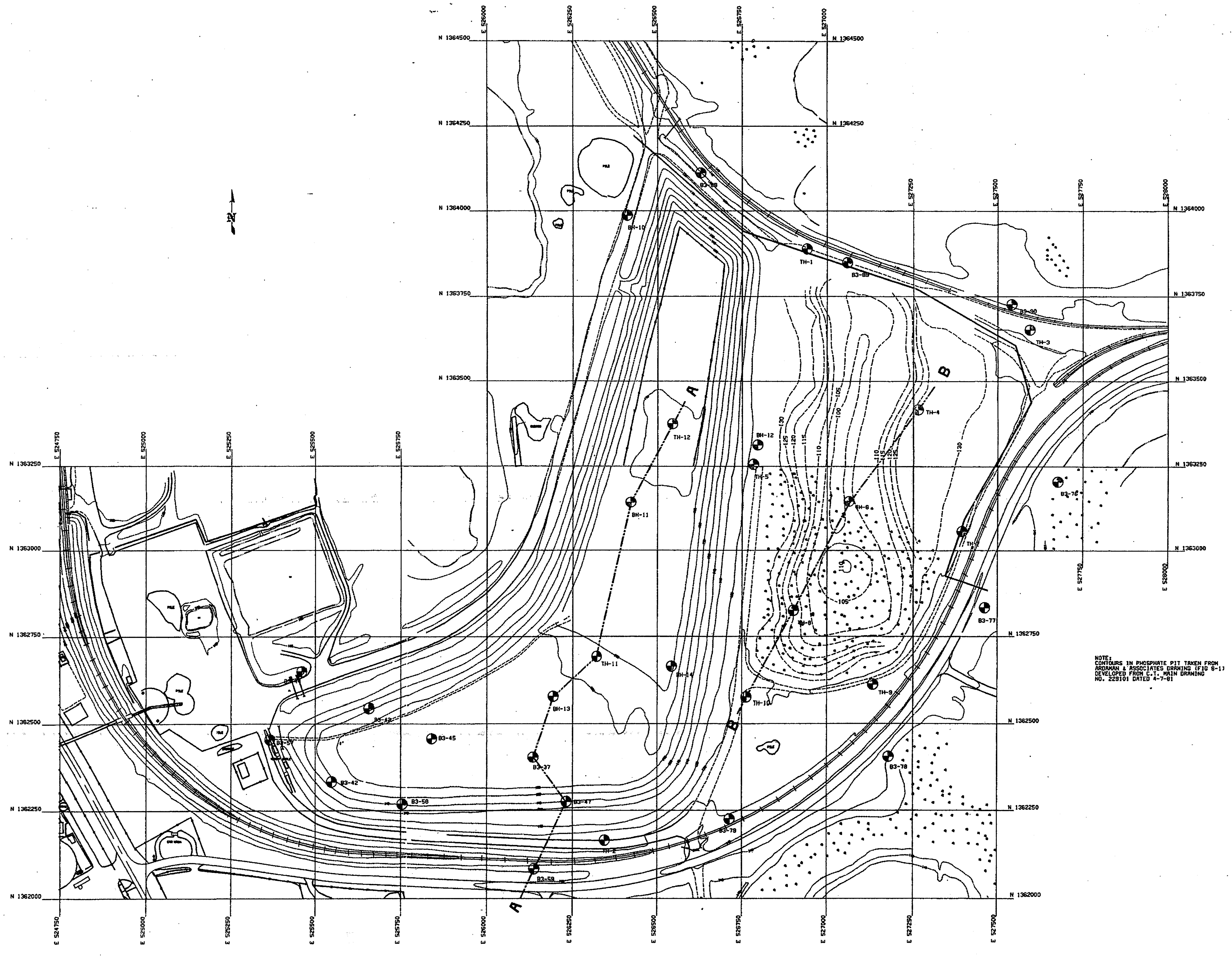
APPENDIX A

Soil Boring Logs and Location Map



NOTE:
CONTOURS IN PHOSPHATE PIT TAKEN FROM
ARDAMAN & ASSOCIATES DRAWING (FIG 6-1)
DEVELOPED FROM C.T. MAIN DRAWING
NO. 229101 DATED 4-7-81

SOIL BORING LOCATION PLAN

08916FULLER ACAD 10 c7
A01SL008 E1 1=100
02/22/91 10:26:06

NO	DATE	REVISIONS AND RECORD OF ISSUE	BY	CHK	APP	FLH
A	02/27/91	GENERAL REVISIONS				

100' 50' 0 100' 200'
1"=100'

I HEREBY CERTIFY THAT THIS DOCUMENT WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY REGISTERED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF
SIGNED
DATE REG NO.

BLACK & VEATCH
ENGINEERS-ARCHITECTS

ENGINEER
DRAWN
CHECKED
DATE

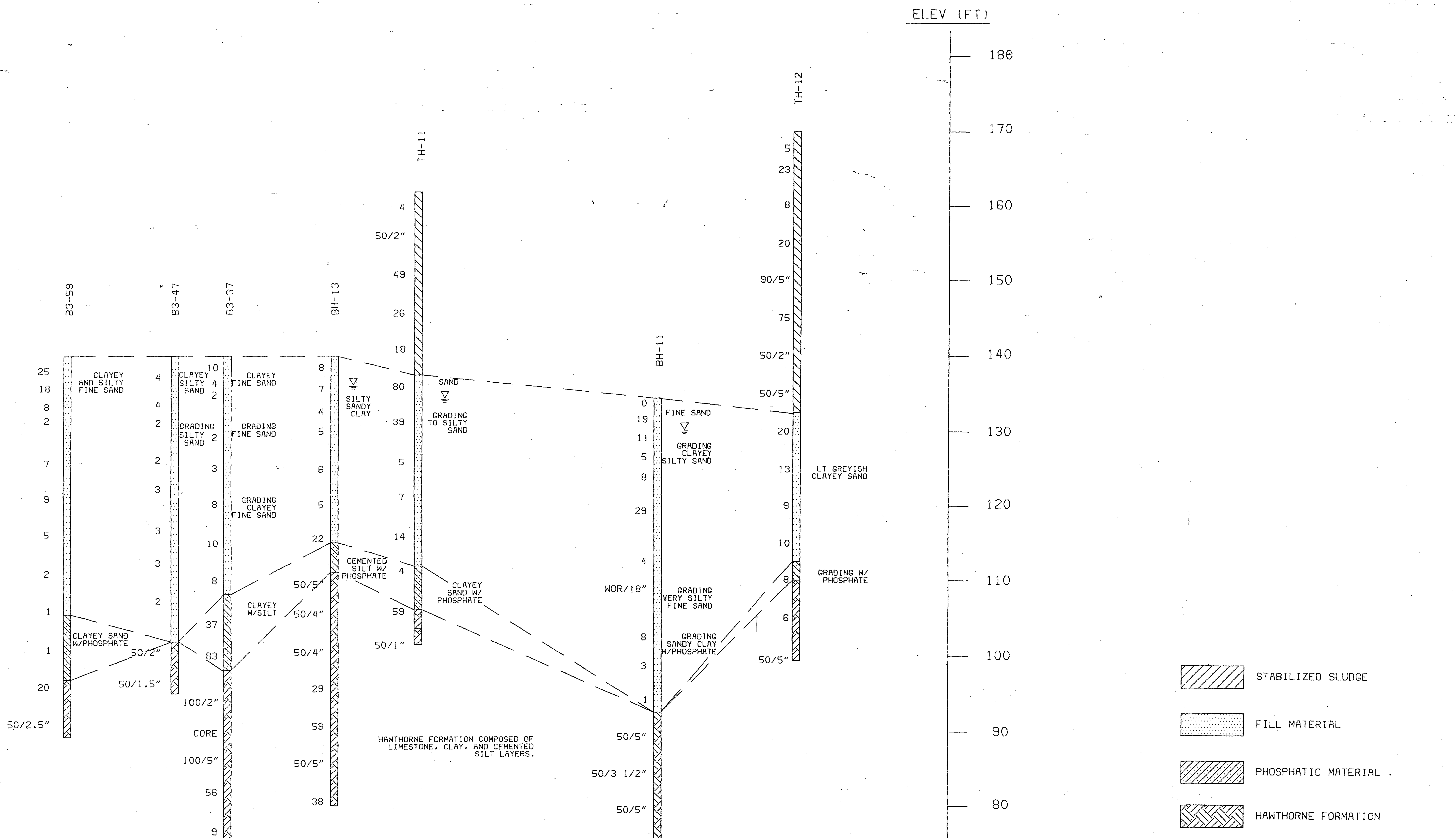
LAKELAND ELECTRIC & WATER
C.D. MCINTOSH PLANT LANDFILL STUDY

SOIL BORING LOCATION
PLAN

PROJECT 17757
DRAWING NUMBER
REV A
CODE
AREA

FIGURE 2-1

24



NOTE: NUMBERS ON THE SIDE OF THE STRATGRAPHICCOLUMNS ARE STANDARD PENETRATION N-VALUES

BORINGS WITH B3- DESIGNATION PERFORMED BY LAW ENGINEERING PRIOR TO LANDFILL CONSTRUCTION.

NO	DATE	REVISIONS AND RECORD OF ISSUE	BY	CHK	APP	FLM
A	02/27/91	GENERAL REVISIONS				

VERT= 1 1/2"=10'

HORIZ= 1"=100'

BLACK & VEATCH
ENGINEERS-ARCHITECTS

ENGINEER MRO
DRAWN GRM
CHECKED
DATE 1-14-91

CITY OF LAKELAND
MCINTOSH LANDFILL

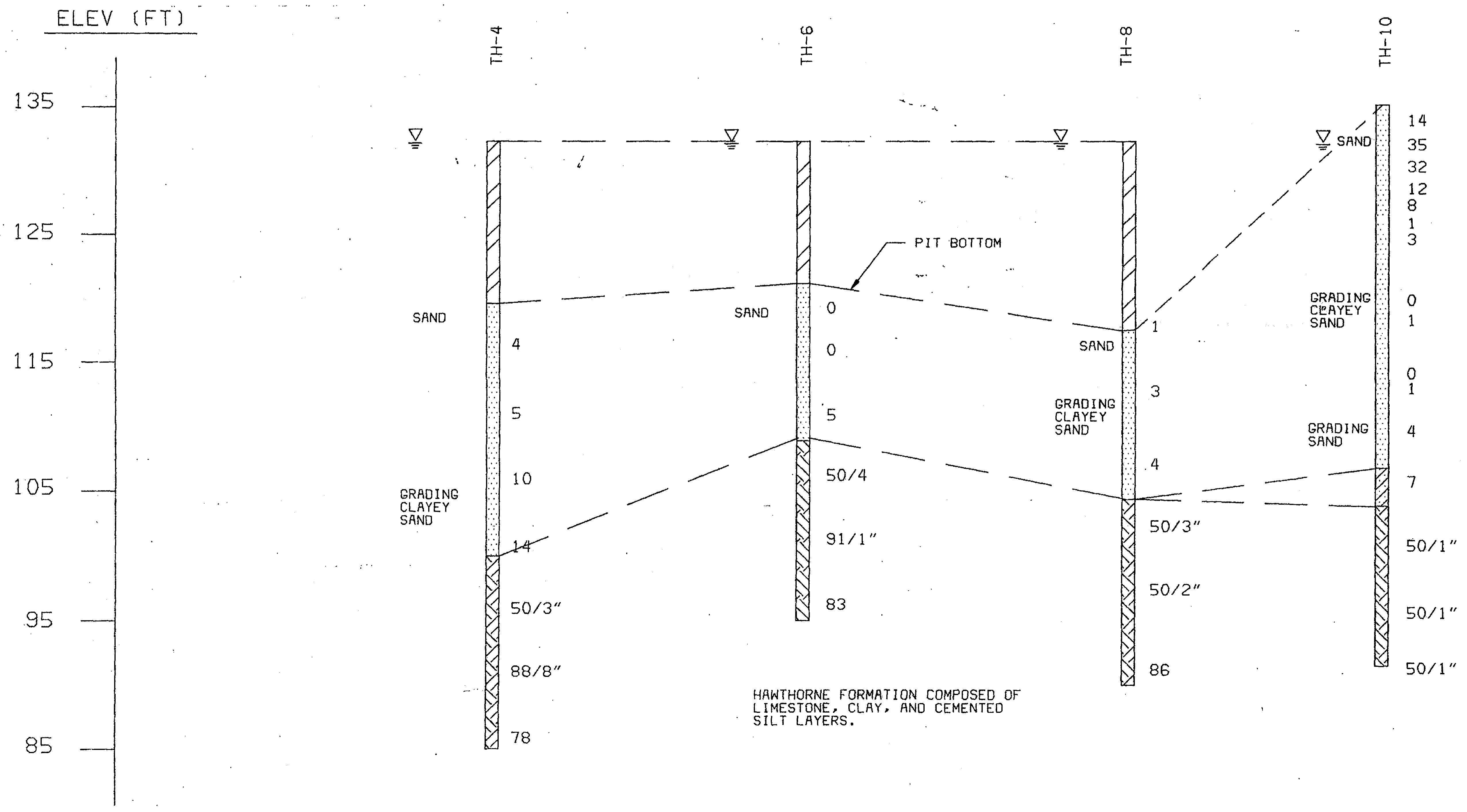
SOIL PROFILE SECTION A-A

PROJECT 17757
DRAWING NUMBER
REV
CODE
AREA

FIGURE 2-2

0891GFULLER ACAD 10 c7
ADISL006 01 1=1
02/22/91 09:39:46

(25)



▨ WATER

░ FILL MATERIAL

▨ PHOSPHATIC MATERIAL

▩ HAWTHORNE FORMATION

NOTE: NUMBERS ON THE SIDE OF THE STRATGRAPHIC COLUMNS ARE STANDARD PENETRATIONS N-VALUES.

NO	DATE	REVISIONS AND RECORD OF ISSUE	BY	CHK	APP	FLM
A	02/27/91	GENERAL REVISIONS				

10' 0 10' 20'
VERT= 1 1/2"=10'
100' 50' 0 100' 200'
HORIZ= 1"=100'

BLACK & VEATCH
ENGINEERS-ARCHITECTS

ENGINEER MRD
DRAWN GRM
CHECKED
DATE 1-14-91

CITY OF LAKELAND
MCINTOSH LANDFILL

SOIL PROFILE SECTION B-B

PROJECT 17757
DRAWING NUMBER
REV A
CODE
AREA

FIGURE 2-3

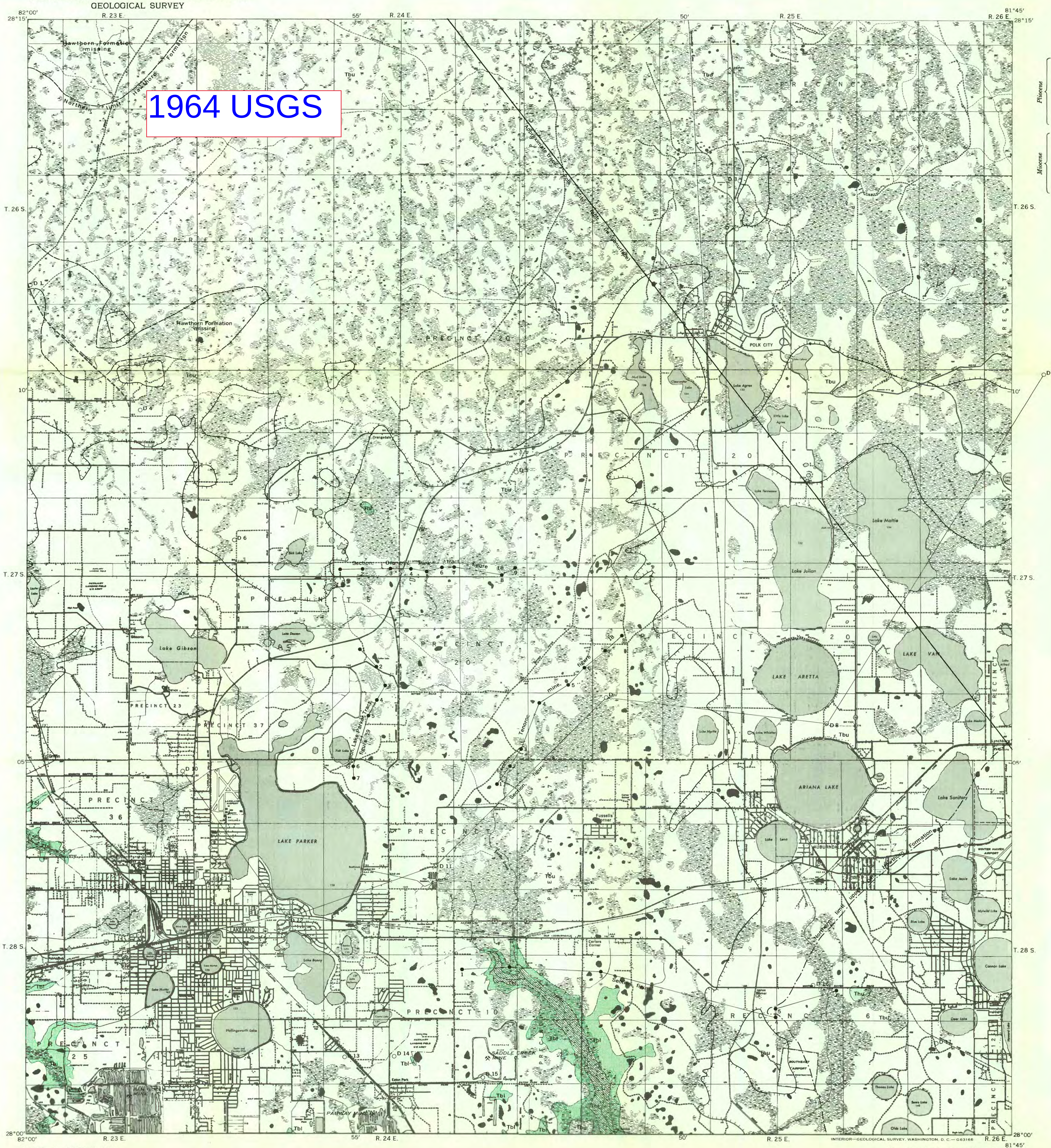
5812MILLER ACAD 10.c7
DISL006 D1 1=1
1/21/91 11:35:15

APPENDIX B

Historical Aerial Photographs and Maps

UNITED STATES DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

BULLETIN 1162-G
PLATE 1



EXPLANATION

Loose quartz sand of Pleistocene and Recent age not shown

Tbu	
Tbl	🟩

Pliocene

Bone Valley Formation

Tbu, *upper unit, white, gray, or green-gray clayey sand with minor phosphate.*
Tbl, *lower unit, phosphorite (sand, clay, and gravel, and abundant phosphate)*

Thu	🟩
Thl	▨

Miocene

Hawthorn Formation

Thu, *upper part, olive-green micaceous clayey sand, minor black phosphate.*
Thl, *lower part, limestone, dolomite, or calcareous clay*

TERTIARY

Contact
Dashed where approximately located; short dashed where inferred

Approximate subsurface extent of the lower unit of the Bone Valley Formation
Hachures point to areas where lower unit is absent

D
U
Fault (in subsurface)
U, *upthrown side;* D, *downthrown side*

⚒
Mine

○D 11
Drill hole location and number

1 2
Section, showing location of drill holes

Base from Army Map Service sheets

INTERIOR—GEOLOGICAL SURVEY, WASHINGTON, D. C.—G63166

Compiled by J. B. Cathcart, 1960 from drilling data, mine maps, and gamma logs

GEOLOGIC MAP OF THE LAKELAND QUADRANGLE, FLORIDA

SCALE 1:48000
1 ½ 0 1 2 3 MILES
1 .5 0 1 2 3 KILOMETERS
DATUM IS MEAN SEA LEVEL

TRUE NORTH
MAGNETIC NORTH
1°
APPROXIMATE MEAN DECLINATION, 1964


McIntosh 1968
Mud Lake
Fish Lake
Lake Parker
N


1971 from FDOT
N
Approximate Footprint of BSA

BSA at Lakeland Electric USGS
11/30/1971
(Current boundary shown by dashed red line)

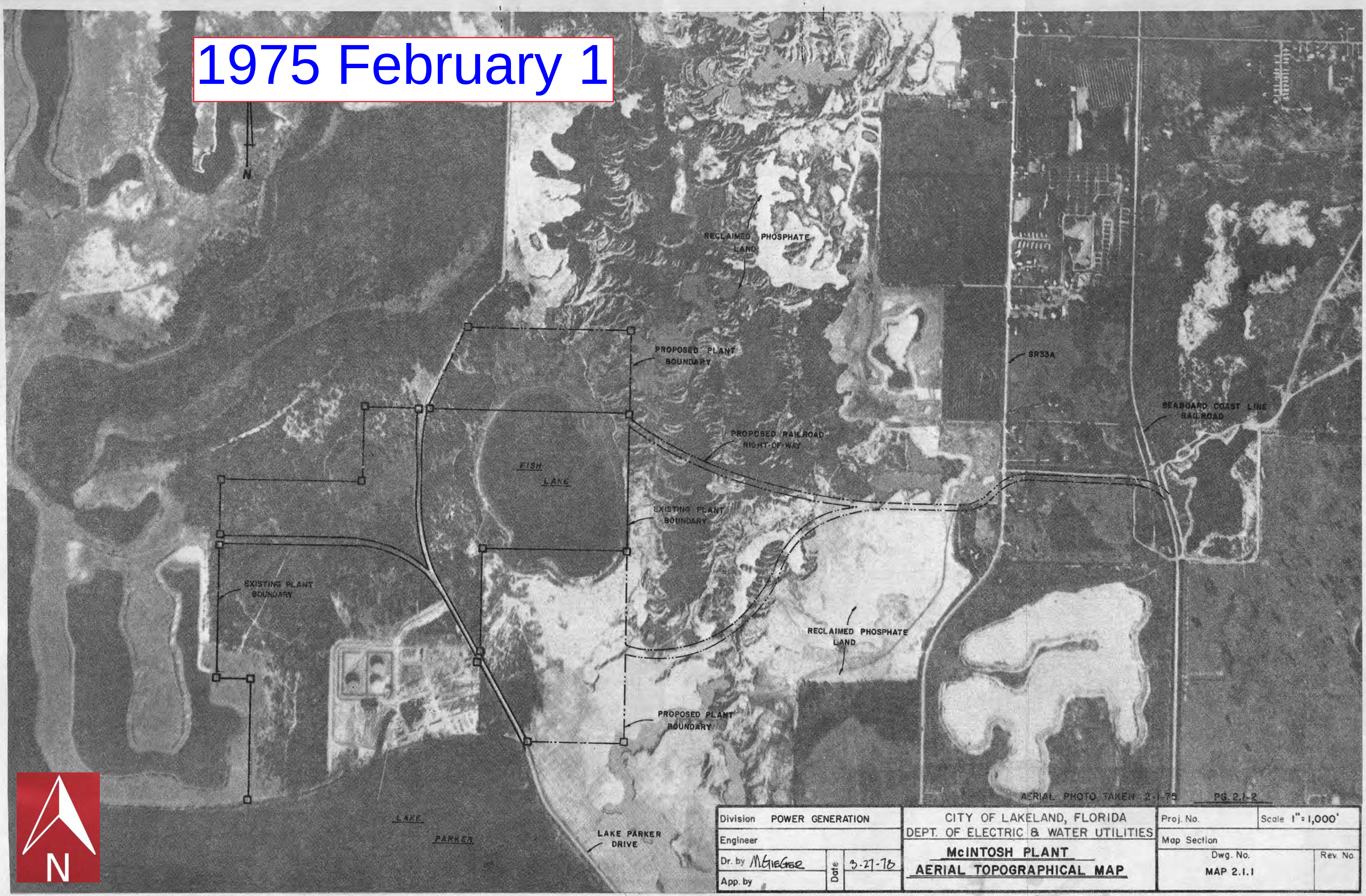
JOB #: 227772 - 03/09/2018

1975 USGS 7.5-minute topographic map including December 2, 1972 Aerial Photograph

1973 from Lakeland Electric

1973 from Lakeland Electric

1975 February 1



AERIAL PHOTO TAKEN 2-1-75 PG. 2.1-2

Division POWER GENERATION		CITY OF LAKELAND, FLORIDA DEPT. OF ELECTRIC & WATER UTILITIES	Proj. No.	Scale 1" = 1,000'	
Engineer			Map Section		
Dr. by MGieGer	Date 3-27-78	McINTOSH PLANT AERIAL TOPOGRAPHICAL MAP	Dwg. No. MAP 2.1.1		Rev. No.
App. by					

BSA at Lakeland Electric USGS
11/26/1977
(Current boundary shown by dashed red line)

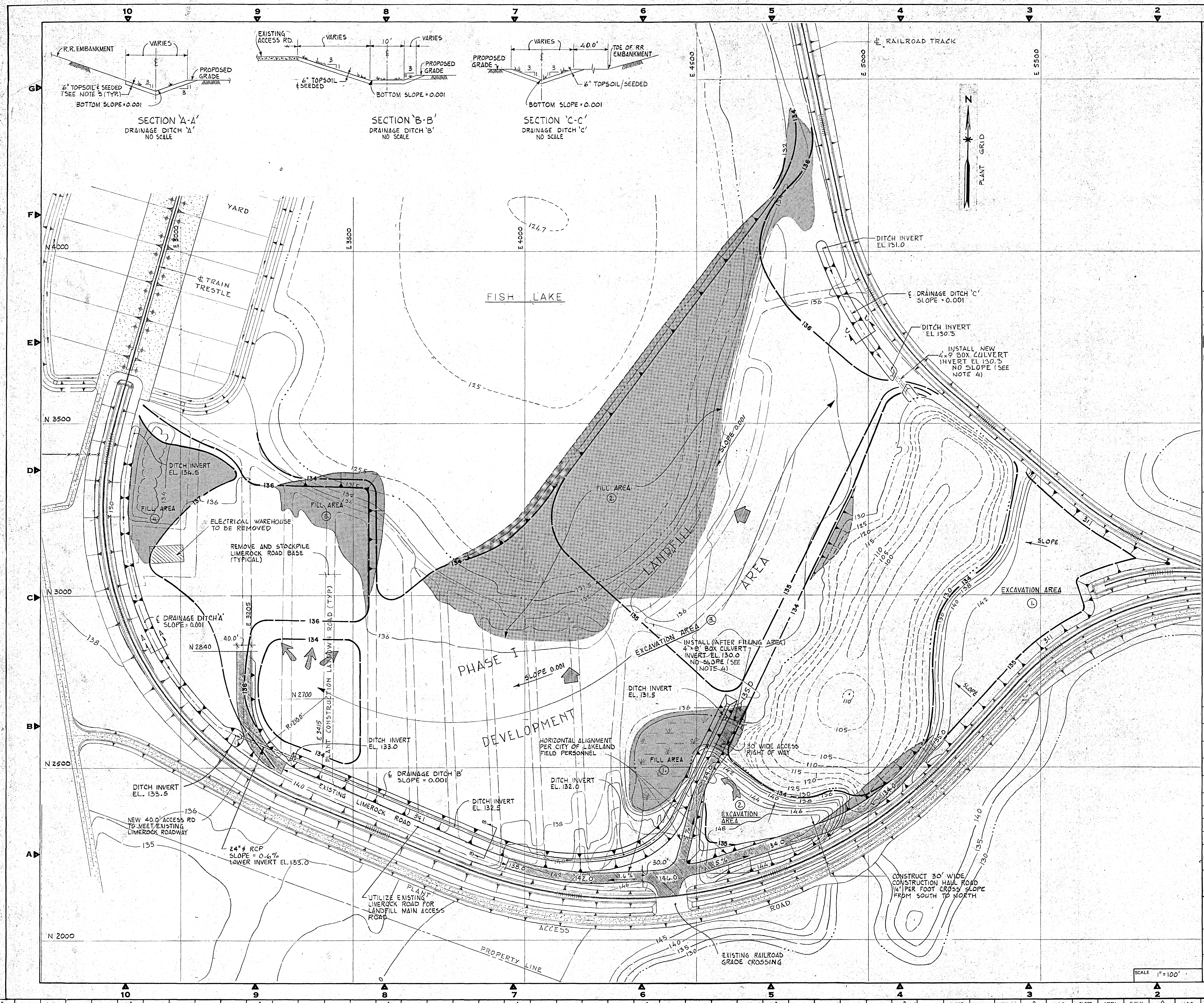
GeoSearch

JOB #: 227772 - 03/09/2018

McIntosh 1980

1:14,774

Polk County BoCC



NOTES:

③

1. THE PROPOSED GRADING AS SHOWN IS BASED ON THE CRITERIA OF A HIGH WATER TABLE OF ELEVATION 132.0. A MINIMUM OF 2.0 FEET MUST BE MAINTAINED BETWEEN THE BASE OF THE LANDFILL DEVELOPMENT AREA AND THE WATER TABLE

2. TOTAL EXCAVATION APPROX. 179,000 C.Y. ±
   AREA 1 = 45,000 C.Y. ±
   AREA 2 = 14,000 C.Y. ±
   AREA 3 = 120,000 C.Y ±

3. FILL AREA VOLUMES EQUAL EXCAVATION QUANTITIES GIVEN (APPROX.)

4. 4'x9' BOX CULVERT TO BE SUPPLIED BY OWNER

5. TOPSOIL AND SEEDING TO BE PLACED IN ACCORDANCE WITH THE STATE OF FLORIDA D.O.T. SPECIFICATION, SECTIONS 162 AND 570 RESPECTIVELY.

6. FOR GENERAL NOTES SEE DWG. 229099

LEGEND:

—135—	EXISTING CONTOUR
—135—	PROPOSED CONTOUR
▨	NEW LIMEROCK STABILIZED ROADWAY
▨	FILL AREA

REFERENCE DRAWINGS:

1. EXISTING SITE PLAN ——————— 229099

NO.	DATE	DESCRIPTION	DRAWN	CHECKED	DES. SUPV.	RESP. ENGR.	SUPV. DISC. ENGR.	CH. DISC. ENGR.
0	5/12/81	FOR REPORT & CONSTRUCTION	MAP	HN	HN	WPL	[illegible]	
A	4/7/81	FOR CLIENT REVIEW	MAP	HN	HN	WPL		

DRAWN BY: M A Smith Jr.
CHECKED BY: Henry Noner
DESIGN SUPV.: Henry Noner
RESP. ENGR.: W P Lendell
SUPV. DISC. ENGR.: [illegible]
CH. DISC. ENGR.: [illegible]
DATE 4/7/81
PROJECT MANAGER
IN CHARGE W.M. IRVING

CITY OF LAKELAND
DEPARTMENT OF ELECTRIC & WATER UTILITIES
C.D. McINTOSH, JR. POWER PLANT—UNIT 3

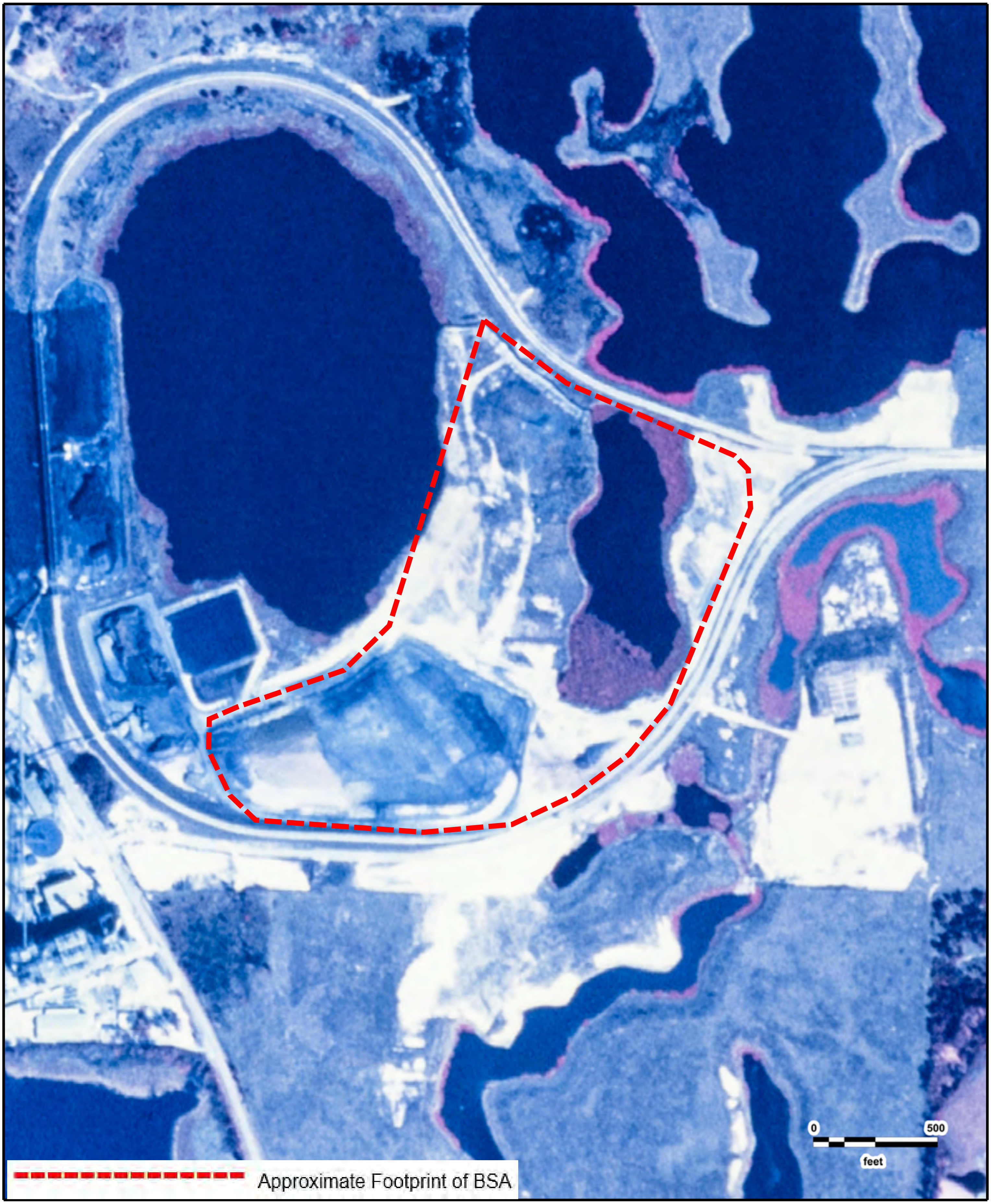
STABILIZED LANDFILL
PHASE I – SITE PREPARATION
GRADING PLAN

MAIN
CHAS. T. MAIN, INC.
BOSTON • NEW YORK • CHARLOTTE • DENVER • PORTLAND

BOSTON
3297-1

DWG. NO. 229101
CLIENT REF. NO.
REV. 0

	I & C	ELECT	MECH	C/S/A
0	JGM	[illegible]	RAC	WPL
A	JGM	[illegible]	RAC	WPL



BSA at Lakeland Electric USGS
03/02/1984
(Current boundary shown by dashed red line)

GeoSearch

JOB #: 227772 - 03/09/2018

APPENDIX C

Record of Borehole Logs for CCR-2A, CCR-4A, CCR-5A, CCR-7A, CCR-13A, and CCR-14A

RECORD OF BOREHOLE CCR-2A

SHEET 1 of 1

PROJECT: Lakeland Electric CCR
PROJECT NUMBER: 19117001
DRILLED DEPTH: 30.0 ft
AZIMUTH: N/A
LOCATION: Lakeland, FL

DRILL METHOD: Direct Push
DRILL RIG: Geoprobe 3230 DT
DATE STARTED: 2/11/2019
DATE COMPLETED: 2/11/2019
WEATHER: Partly cloudy

DATUM: NAD83 / NAVD88
COORDS: N: 1,362,203.9 E: 681,787.6
GS ELEVATION: 137.6 ft
TRC ELEVATION: N/A ft
TEMPERATURE: 74° F

INCLINATION: -90
DEPTH W.L.: 5.9 ft
ELEVATION W.L.: 131.70 ft
DATE W.L.: 3/12/2019
TIME W.L.: 10:45

SOIL PROFILE

DESCRIPTION	USCS	GRAPHIC LOG	ELEV. DEPTH (ft)
0.0 - 1.0 SAND, fine; brown, dry	SP		136.6
1.0 - 2.0 SAND, fine; grayish brown, dry	SP		1.0 135.6
2.0 - 4.0 SAND, fine; light gray, dry	SP		2.0 133.6
4.0 - 7.5 SAND, trace organics, fine to medium, subrounded to subangular, poorly graded; dark brown to black	SP		4.0 130.1
7.5 - 10.8 SAND, fine to medium, subround to subangular, uniform grading; light tan to white, moist	SP		7.5 126.9
10.8 - 13.5 SAND, fine, subrounded, uniform; dark brown to black, compact, wet	SP		10.8 124.1
13.5 - 15.8 No Recovery			13.5 121.9
15.8 - 18.4 SAND, fine, subrounded; light brown to light grey (white with small round black heavy mineral), wet	SP		15.8 119.2
18.4 - 19.5 SAND, fine; dark brown to black (grains are brown), compact to dense, wet	SP		18.4 118.1
19.5 - 20.0 No Recovery			117.6
20.0 - 23.0 SAND, very fine, subrounded; light brown to tan with a dark brown to black coating with small black opaque grains, compact to very dense, wet	SP		20.0 114.6
23.0 - 23.5 CLAYEY SAND; tan to light brown, wet	SC		114.1
23.5 - 25.0 SAND, very fine, subrounded; light brown to tan with a dark brown to black coating with small black heavy mineral, compact to very dense, wet	SP		23.5 112.6
25.0 - 27.5 SAND, fine subrounded, uniform grading; brown, loose to compact, wet	SP		25.0 110.1
27.5 - 30.0 SAND, fine, subrounded; tan to white with small black heavy minerals, compact to dense, wet	SP		27.5 107.6
Boring completed at 30.0 ft			

COMMENTS

1.) Borehole location is adjacent to monitoring well CCR-2; survey coordinates shown are from CCR-2.

2.) Ground surface elevation is estimated based on ground surface elevation of monitoring well CCR-2.

3.) Boreholes were backfilled with 20/30 graded silica sand to 5 ft bgs and the remaining borehole was filled with bentonite chips to land surface.

4.) Water-level elevations are estimated based on depth-to-water measurements from adjacent monitoring well CCR-2.

5.) Density descriptions are based on field observations and not form SPT blow counts.

6.) Soil cores were collected and transported to Golder's Tampa office. The soil cores were later logged by M. Boatman for mineralogic description of lithology.

7.) Based on lithologic descriptions, mine tailings and/or fill was encountered from approximately ground surface to 20 ft bgs and in-situ residual soil and/or weathered rock from 20 ft bgs to terminal depth.

LOG SCALE: 1 in = 4 ft
DRILLING COMPANY: Action Environmental
DRILLER: Omar Velazquez

INSPECTOR: M. Boatman
CHECKED BY: G. Morelli
DATE: 5/30/19

GOLDER

RECORD OF BOREHOLE CCR-4A

SHEET 1 of 1

PROJECT: Lakeland Electric CCR
PROJECT NUMBER: 19117001
DRILLED DEPTH: 30.0 ft
AZIMUTH: N/A
LOCATION: Lakeland, FL

DRILL METHOD: Direct Push
DRILL RIG: Geoprobe 3230 DT
DATE STARTED: 2/11/2019
DATE COMPLETED: 2/11/2019
WEATHER: Partly cloudy

DATUM: NAD83 / NAVD88
COORDS: N: 1,362,450.0 E: 683,042.7
GS ELEVATION: 140.3 ft
TRC ELEVATION: N/A ft
TEMPERATURE: 86° F

INCLINATION: -90
DEPTH W.L.: 11.05 ft
ELEVATION W.L.: 129.25 ft
DATE W.L.: 3/12/2019
TIME W.L.: 10:57

DEPTH (ft)	ELEVATION (ft)	SOIL PROFILE DESCRIPTION	USCS	GRAPHIC LOG	ELEV. DEPTH (ft)
0	140	0.0 - 1.0 SAND, fine; brown, dry	SP		139.3
		1.0 - 2.0 SAND, fine, some gravel and silt; brown, dry	SP		1.0 138.3
		2.0 - 5.0 SAND, fine, some silt; brown, dry	SP-SM		2.0 135.3
5	135	5.0 - 10.4 SILTY SAND, fine, subrounded to subangular, uniform grading; dark brown to black, dry to moist	SM		5.0 129.9
10	130	10.4 - 13.6 SAND, fine to medium, subrounded, uniform grading; dark brown with small black heavy minerals, loose to very loose, wet 12.0 - 13.6 contact water is black	SP		10.4 ▼ 126.7
		13.6 - 15.0 SAND, very fine, subrounded, uniform grading; dark brown with small black heavy minerals, compact, wet	SP		13.6 125.3
15	125	15.0 - 15.8 SAND, fine to medium, subrounded, uniform grading; dark brown with small black heavy minerals, loose to very loose, wet, water is black	SP		15.0 124.5
		15.8 - 19.5 SAND, fine, subrounded, uniform grading; light to dark brown, compact to dense, wet	SP		15.8 120.8
20	120	19.5 - 21.1 SAND little to some clay; fine, angular to subrounded, uniform grading; white to tan with small black heavy minerals, wet	SP-SC		19.5 119.2
		21.1 - 22.8 SAND some clay, fine, subrounded; white to pale green, moist	SP-SC		21.1 117.5
		22.8 - 23.4 CLAY some sand and trace gravel; soft; fine, limestone gravel, brownish gray; pale green to greenish gray, moist	CL		116.9
25	115	23.4 - 28.2 Sandy CLAY, trace to some silt; pale green to white, loose to compact, wet, fossiliferous (weathered limestone)	CL		23.4 112.1
		28.2 - 30.0 CLAY trace sand and gravel; soft; fine angular sand, fine rounded gravel; green, moist (weathered limestone)	CL		28.2 110.3
30	110	Boring completed at 30.0 ft			

COMMENTS

1.) Borehole location is adjacent to monitoring well CCR-4; survey coordinates shown are from CCR-4.

2.) Ground surface elevation is estimated based on ground surface elevation of monitoring well CCR-4.

3.) Boreholes were backfilled with 20/30 graded silica sand to 5 ft bgs and the remaining borehole was filled with bentonite chips to land surface.

4.) Water-level elevations are estimated based on depth-to-water measurements from adjacent monitoring well CCR-4.

5.) Density descriptions are based on field observations and not form SPT blow counts.

6.) Soil cores were collected and transported to Golder's Tampa office. The soil cores were later logged by M. Boatman for mineralogic description of lithology.

7.) Based on lithologic descriptions, mine tailings and/or fill was encountered from approximately ground surface to 19.5 ft bgs and in-situ residual soil and/or weathered rock from 19.5 ft bgs to terminal depth.

LOG SCALE: 1 in = 4 ft
DRILLING COMPANY: Action Environmental
DRILLER: Omar Velazquez

INSPECTOR: M. Boatman
CHECKED BY: G. Morelli
DATE: 5/30/19

GOLDER

RECORD OF BOREHOLE CCR-5A

SHEET 1 of 1

PROJECT: Lakeland Electric CCR
PROJECT NUMBER: 19117001
DRILLED DEPTH: 30.0 ft
AZIMUTH: N/A
LOCATION: Lakeland, FL

DRILL METHOD: Direct Push
DRILL RIG: Geoprobe 3230 DT
DATE STARTED: 2/11/2019
DATE COMPLETED: 2/11/2019
WEATHER: Partly cloudy

DATUM: NAD83 / NAVD88
COORDS: N: 1,362,716.0 E: 683,376.9
GS ELEVATION: 138.6 ft
TRC ELEVATION: N/A ft
TEMPERATURE: 88° F

INCLINATION: -90
DEPTH W.L.: 7.29 ft
ELEVATION W.L.: 131.31 ft
DATE W.L.: 3/12/2019
TIME W.L.: 11:00

DEPTH (ft)	ELEVATION (ft)	SOIL PROFILE DESCRIPTION	USCS	GRAPHIC LOG	ELEV. / DEPTH (ft)
0	135	0.0 - 5.0 SAND, fine; brown, dry	SP		133.6
5		5.0 - 8.4 SAND, fine to medium, subrounded, uniform grading; white with small rounded black heavy minerals	SP		5.0 130.2
	130	8.4 - 8.9 CLAY some sand and gravel; fine white gravel and fine to medium sand; white, moist	CL		129.7
		8.9 - 10.0 SAND, fine to medium, subrounded; white with small black heavy minerals, moist	SP		8.9 128.6
10		10.0 - 12.3 No Recovery			10.0 126.3
		12.3 - 13.0 SAND, fine to medium, subrounded; dark brown, loose, moist	SP		12.3 125.6
	125	13.0 - 15.0 SAND and CLAY; fine, subrounded; soft to firm; white to pale green with orange spots	SC		13.0 123.6
15		15.0 - 16.9 No Recovery			15.0 121.7
		16.9 - 18.2 SAND trace to some silt; fine to medium, subrounded to subangular; dark brown to black, loose to compact, moist to wet	SP-SM		16.9 120.4
	120	18.2 - 19.3 SAND, fine; dark brown with small black heavy minerals, loose to compact, wet	SP		18.2 119.3
		19.3 - 20.0 SAND, very fine to fine; dark brown to black, loose to compact, wet, contact water separates to tan and black	SP		19.3 118.6
20		20.0 - 22.3 No Recovery			20.0 116.3
		22.3 - 23.1 SAND some clay; fine, subrounded; soft; dark brown, wet	SP-SC		22.3 115.5
	115	23.1 - 24.2 SAND, fine to medium, subrounded; dark brown with smal black heavy minerals, loose, wet	SP		23.1 114.4
		24.2 - 25.0 SAND trace gravel; fine, subrounded, sand; fine to coarse, rounded, gravel; tan to white, wet	SP		24.2 113.6
25		25.0 - 27.4 No Recovery			25.0 111.2
		27.4 - 28.5 SAND, fine, rounded, dark brown with black heavy minerals, loose, wet	SP		27.4 110.1
	110	28.5 - 30.0 SAND trace organics; fine to medium; twigs and roots; light brown to light gray with black heavy minerals, loose, wet	SP		28.5 108.6
30		Boring completed at 30.0 ft			

COMMENTS

1.) Borehole location is adjacent to monitoring well CCR-5; survey coordinates shown are from CCR-5.

2.) Ground surface elevation is estimated based on ground surface elevation of monitoring well CCR-5.

3.) Boreholes were backfilled with 20/30 graded silica sand to 5 ft bgs and the remaining borehole was filled with bentonite chips to land surface.

4.) Water-level elevations are estimated based on depth-to-water measurements from adjacent monitoring well CCR-5.

5.) Density descriptions are based on field observations and not form SPT blow counts.

6.) Soil cores were collected and transported to Golder's Tampa office. The soil cores were later logged by M. Boatman for mineralogic description of lithology.

7.) Based on lithologic descriptions, mine tailings and/or fill was encountered from approximately ground surface to terminal depth.

LOG SCALE: 1 in = 4 ft
DRILLING COMPANY: Action Environmental
DRILLER: Omar Velazquez

INSPECTOR: M. Boatman
CHECKED BY: G. Morelli
DATE: 5/30/19

RECORD OF BOREHOLE CCR-7A

SHEET 1 of 1

PROJECT: Lakeland Electric CCR
PROJECT NUMBER: 19117001
DRILLED DEPTH: 30.0 ft
AZIMUTH: N/A
LOCATION: Lakeland, FL

DRILL METHOD: Direct Push
DRILL RIG: Geoprobe 3230 DT
DATE STARTED: 2/11/2019
DATE COMPLETED: 2/11/2019
WEATHER: Partly cloudy

DATUM: NAD83 / NAVD88
COORDS: N: 1,363,631.9 E: 683,772.2
GS ELEVATION: 139.1 ft
TRC ELEVATION: N/A ft
TEMPERATURE: 86° F

INCLINATION: -90
DEPTH W.L.: 5.43 ft
ELEVATION W.L.: 133.67 ft
DATE W.L.: 3/12/2019
TIME W.L.: 11:05

SOIL PROFILE

DEPTH (ft)	ELEVATION (ft)	DESCRIPTION	USCS	GRAPHIC LOG	ELEV. DEPTH (ft)
0	135	0.0 - 5.0 SAND, fine; light brownish gray, dry to wet 4.0: ~ moist at 4 ft bgs	SP		134.1
5		5.0 - 6.0 No Recovery			5.0 ▼ 133.1
		6.0 - 7.0 SAND with pockets of sand/clay; fine, subrounded, uniform grading; fine sand/clay matrix, firm; tan to dark brown, loose to compact, wet	SP		6.0 132.1
		7.0 - 7.4 SAND, fine, subrounded, uniform grading; black, loose to compact, wet	SP		131.7
	130	7.4 - 10.0 SAND with pockets of sand/clay; fine, subrounded, uniform grading; fine sand/clay matrix, firm; tan to dark brown, loose to compact, wet	SP		7.4 129.1
10		10.0 - 11.0 No Recovery			10.0 128.1
	125	11.0 - 15.0 SILTY SAND, fine, subrounded, uniform grading, dark brown with black heavy minerals, loose, wet 13.4: 13.4-13.8 pockets of white sand/clay matrix	SM		11.0 124.1
15		15.0 - 17.0 No Recovery			15.0 122.1
		17.0 - 17.8 SAND trace to some silt; fine, uniform grading; dark brown to black, wet	SP-SM		17.0 121.3
		17.8 - 18.5 CLAY; white, soft to firm, moist	CL		17.8 120.6
	120	18.5 - 20.0 SAND trace to some silt and sady clay; fine, uniform grading; dark brown, wet	SP-SM		18.5 119.1
20	115	20.0 - 25.0 SAND with pockets of sandy clay; fine, uniform grading; white clay; brown with black heavy minerals, wet	SP/CL		20.0 114.1
25		25.0 - 26.1 No Recovery			25.0 113.0
		26.1 - 26.6 SAND, fine, subrounded, uniform grading; dark brown, loose, wet	SP		112.5
		26.6 - 27.2 SAND and CLAY; fine to coarse; soft; white to pale green, wet	SC/CL		111.9
		27.2 - 28.6 SAND, fine, subrounded, uniform grading; light brown, loose, wet	SP		27.2 110.5
	110	28.6 - 29.3 Sandy CLAY; fine to coarse, subrounded; compact, pale green, moist	CL		28.6 109.8
30		29.3 - 30.0 Sandy CLAY, fine, subrounded, uniform grading; light to dark brown, loose, wet	CL		29.3 109.1

Boring completed at 30.0 ft

COMMENTS

1.) Borehole location is adjacent to monitoring well CCR-7; survey coordinates shown are from CCR-7.

2.) Ground surface elevation is estimated based on ground surface elevation of monitoring well CCR-7.

3.) Boreholes were backfilled with 20/30 graded silica sand to 5 ft bgs and the remaining borehole was filled with bentonite chips to land surface.

4.) Water-level elevations are estimated based on depth-to-water measurements from adjacent monitoring well CCR-7.

5.) Density descriptions are based on field observations and not form SPT blow counts.

6.) Soil cores were collected and transported to Golder's Tampa office. The soil cores were later logged by M. Boatman for mineralogic description of lithology.

7.) Based on lithologic descriptions, mine tailings and/or fill was encountered from approximately ground surface to 17 ft bgs and in-situ residual soil and/or weathered rock from 17 ft bgs to terminal depth.

LOG SCALE: 1 in = 4 ft
DRILLING COMPANY: Action Environmental
DRILLER: Omar Velazquez

INSPECTOR: M. Boatman
CHECKED BY: G. Morelli
DATE: 5/30/19

GOLDER

RECORD OF BOREHOLE CCR-13A

SHEET 1 of 1

PROJECT: Lakeland Electric CCR
PROJECT NUMBER: 19117001
DRILLED DEPTH: 30.0 ft
AZIMUTH: N/A
LOCATION: Lakeland, FL

DRILL METHOD: Direct Push
DRILL RIG: Geoprobe 3230 DT
DATE STARTED: 2/12/2019
DATE COMPLETED: 2/12/2019
WEATHER: Partly cloudy

DATUM: NAD83 / NAVD88
COORDS: N: 1,362,936.6 E: 682,164.1
GS ELEVATION: 135.0 ft
TRC ELEVATION: N/A ft
TEMPERATURE: 72° F

INCLINATION: -90
DEPTH W.L.: 2.39 ft
ELEVATION W.L.: 132.61 ft
DATE W.L.: 3/12/2019
TIME W.L.: 11.58

DEPTH (ft)	ELEVATION (ft)
0	135
5	130
10	125
15	120
20	115
25	110
30	105

SOIL PROFILE

DESCRIPTION	USCS	ELEV. / DEPTH (ft)
0.0 - 2.0 SAND, fine; light brown, dry	SP	133.0
2.0 - 4.0 SAND, fine; dark grayish brown, dry	SP	2.0 ▼ 131.0
4.0 - 5.0 SAND, fine; brown, dry	SP	4.0 130.0
5.0 - 7.1 SAND, fine, subrounded, uniform grading; black to dark gray, loose, moist to wet	SP	5.0 127.9
7.1 - 9.4 SILTY SAND, fine, uniform grading; tan to white, compact to dense, wet	SM	7.1 125.6
9.4 - 10.0 SAND, fine, uniform grading; black with heavy minerals, loose, wet	SP	125.0
10.0 - 12.0 No Recovery		10.0 123.0
12.0 - 15.0 SAND, fine to medium, subrounded; dark brown, loose to compact, wet 14.2: root encountered	SP	12.0 120.0
15.0 - 17.0 No Recovery		15.0 118.0
17.0 - 19.0 SAND trace to some clay, fine, uniform grading; grayish brown/tan with black heavy minerals, loose, wet. - two black bands at 17.3 and 17.6 ft bgs	SP-SC	17.0 116.0
19.0 - 20.0 SAND, fine, uniform grading; grayish brown with black heavy minerals, compact, moist	SP	19.0 115.0
20.0 - 25.0 SAND, fine to medium, uniform grading; tan to white wih heavy minerals grains, wet	SP	20.0 110.0
25.0 - 30.0 CLAY trace sand; fine, sand; white to pale green, firm to stiff, slight mottling, moist	CL	25.0 105.0

Boring completed at 30.0 ft

COMMENTS

1.) Borehole location is adjacent to monitoring well CCR-13; survey coordinates shown are from CCR-13.

2.) Ground surface elevation is estimated based on ground surface elevation of monitoring well CCR-13.

3.) Boreholes were backfilled with 20/30 graded silica sand to 5 ft bgs and the remaining borehole was filled with bentonite chips to land surface.

4.) Water-level elevations are estimated based on depth-to-water measurements from adjacent monitoring well CCR-13.

5.) Density descriptions are based on field observations and not form SPT blow counts.

6.) Soil cores were collected and transported to Golder's Tampa office. The soil cores were later logged by M. Boatman for mineralogic description of lithology.

7.) Based on lithologic descriptions, mine tailings and/or fill was encountered from approximately ground surface to 25 ft bgs and in-situ residual soil and/or weathered rock from 25 ft bgs to terminal depth.

LOG SCALE: 1 in = 4 ft
DRILLING COMPANY: Action Environmental
DRILLER: Omar Velazquez

INSPECTOR: M. Boatman
CHECKED BY: G. Morelli
DATE: 5/30/19

GOLDER

RECORD OF BOREHOLE CCR-14A

SHEET 1 of 1

PROJECT: Lakeland Electric CCR
PROJECT NUMBER: 19117001
DRILLED DEPTH: 30.0 ft
AZIMUTH: N/A
LOCATION: Lakeland, FL

DRILL METHOD: Direct Push
DRILL RIG: Geoprobe 3230 DT
DATE STARTED: 2/12/2019
DATE COMPLETED: 2/12/2019
WEATHER: Partly cloudy

DATUM: NAD83 / NAVD88
COORDS: N: 1,362,771.1 E: 681,761.2
GS ELEVATION: 135.8 ft
TRC ELEVATION: N/A ft
TEMPERATURE: 75° F

INCLINATION: -90
DEPTH W.L.: 3.76 ft
ELEVATION W.L.: 132.04 ft
DATE W.L.: 3/12/2019
TIME W.L.: 12:06

SOIL PROFILE

DESCRIPTION	USCS	ELEV. DEPTH (ft)
0.0 - 5.0 SAND, fine; brown, dry to moist	SP	
5.0 - 7.4 SAND some silt; fine, subrounded, uniform grading; grayish brown, wet, loose 6.3: 6.3-6.7 ft bgs, CLAY pocket; soft; white, moist	SP-SM	130.8 5.0
7.4 - 10.0 SAND, fine, subrounded, uniform grading; light to medium grayish brown, moist 8.6: 8.6-8.8 ft bgs, (CL) CLAY; soft; white, moist	SP	128.4 7.4
10.0 - 11.2 No Recovery		125.8 10.0
11.2 - 12.3 SILTY SAND, fine, subrounded, uniform graded; white to light gray, wet, loose	SM	124.6 11.2
12.3 - 15.0 CLAYEY SAND to Sandy CLAY, fine, subrounded; white to tan, moist, compact	SC/CL	123.5 12.3
15.0 - 16.4 No Recovery		120.8 15.0
16.4 - 18.3 CLAYEY SAND to Sandy CLAY, fine to coarse, subangular, fossil fragments; white to pale green, wet, loose to compact	SC/CL	119.4 16.4
18.3 - 20.0 SAND, fine to medium, subrounded to subangular, uniform grading; moist, compact to dense	SP	117.5 18.3
20.0 - 22.8 Sandy CLAY; fine to coarse, subangular coarse (fossil fragments); pale green to green, compact to dense (weathered limestone)	CL	115.8 20.0
22.8 - 25.0 Sandy CLAY, fine to medium; white to pale green, moist, loose to compact	CL	113.0 22.8
25.0 - 27.0 Sandy CLAY; fine to coarse, subangular coarse (fossil fragments); pale green to green, compact to dense (weathered limestone)	CL	110.8 25.0
27.0 - 30.0 CLAY trace sand; coarse sand; green and olive brown mottled, phosphatic grains, moist, stiff to hard (weathered limestone)	CL	108.8 27.0
Boring completed at 30.0 ft		105.8

COMMENTS

1.) Borehole location is adjacent to monitoring well CCR-14; survey coordinates shown are from CCR-14.

2.) Ground surface elevation is estimated based on ground surface elevation of monitoring well CCR-14.

3.) Boreholes were backfilled with 20/30 graded silica sand to 5 ft bgs and the remaining borehole was filled with bentonite chips to land surface.

4.) Water-level elevations are estimated based on depth-to-water measurements from adjacent monitoring well CCR-14.

5.) Density descriptions are based on field observations and not form SPT blow counts.

6.) Soil cores were collected and transported to Golder's Tampa office. The soil cores were later logged by M. Boatman for mineralogic description of lithology.

7.) Based on lithologic descriptions, in-situ residual soil and/or weathered rock was encountered from approximately ground surface to terminal depth.

LOG SCALE: 1 in = 4 ft
DRILLING COMPANY: Action Environmental
DRILLER: Omar Velazquez

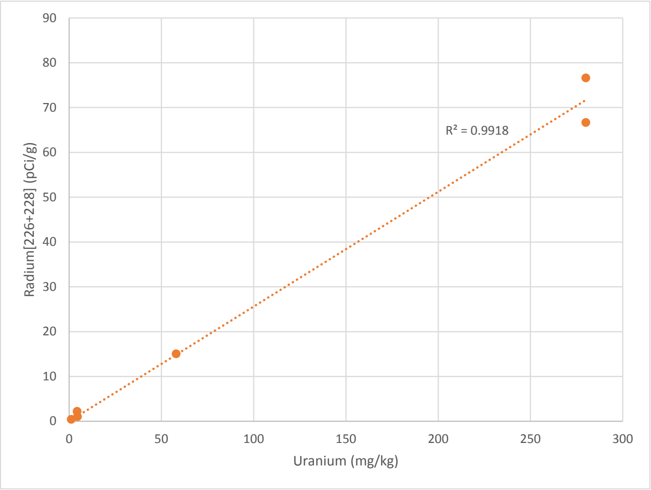
INSPECTOR: M. Boatman
CHECKED BY: G. Morelli
DATE: 5/30/19

GOLDER

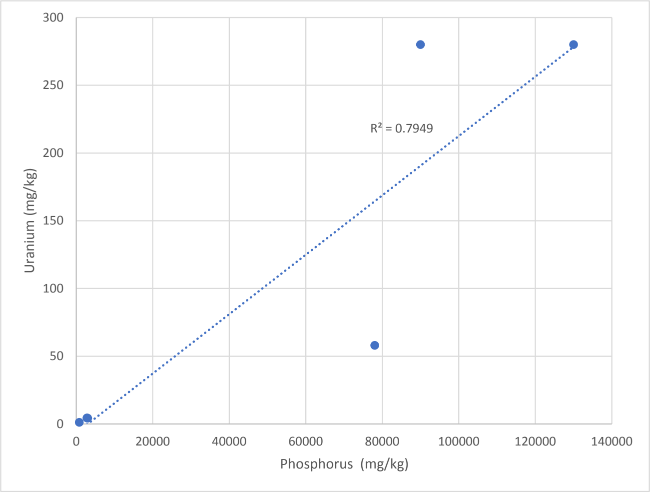
APPENDIX D

Geochemical Evaluation of Radium-226+228 in Soils

(a)



(b)



Results of chemical analysis of soils from boreholes for radionuclides and phosphorus

Soil Boring ID	Depth of samples (ft. bgs.)	Total Uranium (mg/kg)	Phosphorus (mg/kg)	Radium 226 (pCi/g)	Radium 228 (pCi/g)	Total Radium (pCi/g)
CCR-4A	24 - 25	280	130,000	75.9	0.726	76.6
CCR-15	24 - 25	4.5	2,800	0.702	0.328	1.03
CCR-16	24 - 25	4.3	3,000	1.14	1.07	2.21
CCR-18	24 - 25	1.2	800	0.443	ND	0.443
CCR-22	24 - 25	280	90,000	65.2	1.49	66.7
CCR-23	24 - 25	58	78,000	14.7	0.359	15.1

Notes:

mg/kg- milligrams per kilogram
pCi/g- picocuries per gram
ft. bgs.- feet below ground surface

CLIENT
LAKELAND ELECTRIC

CONSULTANT
GOLDER

PROJECT
BSA CCR GROUNDWATER
C.D. McINTOSH POWER PLANT
LAKELAND, POLK COUNTY, FLORIDA

TITLE
GEOCHEMICAL EVALUATION OF RADIUM-226+228 IN SOILS

PROJECT NO.	PHASE	REV.	FIGURE
19-117001	01	A	D

IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM: ANSI A

1 in
0

APPENDIX E

Mineralogical Assessment
prepared by Petrologic Solutions, Inc.

Petrologic Solutions, Inc.
3997 Oak Hill Road
Douglasville, GA 30135
Tel: (678) 313-4146
rlkath@comcast.net

June 4, 2019 P18-2058

Anthony Grasso, P.G.
Golder Associates Inc.
5402 Beaumont Center Boulevard, Suite 108
Tampa, Florida, USA 33634

RE: TRANSMITTAL OF ANALYTICAL RESULTS IN SUPPORT OF THE EVALUATION OF RADIONUCLIDE SOURCES AT THE C.D. McINTOSH POWER PLANT, POLK COUNTY, LAKELAND, FLORIDA

Dear Mr. Grasso:

Petrologic Solutions, Inc. (Petrologic) was retained by Golder Associates Inc. (Golder) to evaluate soil samples for the presence of naturally-occurring radiogenic minerals and elements in support of Lakeland Electric's evaluation of radionuclide sources beneath the Byproduct Storage Area (BSA) at the C.D. McIntosh Power Plant (MPP) in Lakeland, Florida. For this work effort, Petrologic conducted petrographic analysis, qualitative X-ray diffraction (XRD), Scanning Electron Microscopy (SEM), and bulk geochemical analysis of unconsolidated soil samples collected from borings recently advanced at the site. Analytical procedures and results of these analyses are presented herein.

1.0 SAMPLE COLLECTION, PREPARATION, AND DESCRIPTION

Six soil borings were advanced around the perimeter of the BSA adjacent to monitoring wells CCR2, CCR4, CCR5, CCR7, CCR13, and CCR14 in February 2019, using Direct Push Technology (DPT). These additional borings, designated CCR2A, CCR4A, CCR5A, CCR7A, CCR13A, and CCR14A, were each extended to 30 feet below ground surface (ft. bgs). The locations of the borings were selected to evaluate geologic conditions of downgradient monitoring wells that encountered statistically significant levels of Radium-226 (Ra^{226}) and Radium-228 (Ra^{228}) during recent groundwater sampling events. An additional boring was located adjacent to CCR2, which occurs in an upgradient or side gradient position relative to the BSA. Golder logged the soil samples collected from the borings on March 1, 2019 and shipped 40 representative samples to Petrologic for analysis. Upon receipt, the soil samples were saturated; consequently, the samples were dried at 100 °C for 12-hours and then relogged by Petrologic.

Based on visual observation of the dried samples, generally two different material types were represented in the 40 samples collected. The upper-most unit consists of subangular to subrounded, fine- to medium-grained sand that varies in color, silt content, and abundance of heavy minerals. The sand-sized material is largely comprised of quartz, feldspar and a variety of dark heavy minerals; mineralogy of the very fine-grained matrix of the sand could not be determined through visual observation. This unit, as represented on the soil logs provided by Golder, ranges from approximately 20 feet to greater than 30 feet thick and was encountered in the upper parts of each of the additional DPT borings advanced. Although the samples show lithologic variability, no lateral continuity was apparent, giving the material a disturbed or disrupted appearance.

A second unit, observed to locally underlie the sand unit, consists of white to buff-tan, very fine- to fine-grained clayey sand to sandy clay with variable concentrations of silt and local occurrence of marine fossils (bryozoans and bivalves) and bone fragments. This lower unit is largely comprised of clay and quartz, with accessory minerals including rounded brown collophane (fine-grained apatite) "balls" and dolomite. Where present, this clayey sand to sandy clay unit, as represented on the soil logs provided by Golder, ranges from at least 5 feet to 10 feet thick and was encountered in the lower part of each of the DPT borings advanced except for CCR2A and CCR5A. The lateral continuity of this material along with the occurrence of dolomite, marine fossils, and bone, indicates that this unit may represent in-situ material.

From the 40 samples provided, Petrologic selected a subset of 16 samples for supplemental evaluation using a variety of analytical techniques, discussed in Section 2.0. These 16 samples were screened for the occurrence of radiogenic minerals using petrographic analysis of polished thin sections, XRD analysis, and radiogenic elements using bulk geochemistry. Based on these results, Petrologic selected a subset of 5 samples for SEM analysis to evaluate the presence of radiogenic minerals observed in thin section.

2.0 ANALYTICAL TECHNIQUES

Petrographic Analysis

Splits of the dried samples were prepared for petrographic analysis. The 16 soil samples selected from CCR2A, CCR4A, CCR5A, CCR7A, CCR13A, and CCR14A were re-dried and vacuum impregnated with clear epoxy by National Petrographic. The samples were mounted to a microscope slide; once the epoxy cured and then cut using a water-based cutoff saw. After drying the epoxy at 130 °C for 35 minutes, the billets were cut off from the microscope slides and the epoxied material was ground to approximately 35μm. After reaching 35μm, the samples were then polished using a roto-polishing system to a final thickness of 30μm. During grinding and polishing of the clayey samples, the clays were absorbing the grinding oils; consequently, the oil was cleaned with acetone repetitively during the grinding and polishing process to prevent oil from impregnating the clays.

Photomicrographs of the thin sections were taken using plane-polarized light (PPL), cross-polarized light (XPL), or reflected light (RL) on standard using an Olympus BX-60 petrographic microscope and Pixelink 662 digital camera in the microscopy lab at the University of West Georgia, Department of Geosciences. Unless otherwise indicated, all images were taken at 5x magnification; the long-edge of the field of view in the photographs is approximately 2.5 mm in length. Representative photomicrographs are presented in Attachment 1.

Qualitative X-Ray Diffraction - XRD

Splits of the dried samples were prepared for qualitative XRD analysis. The 16 soil samples selected from CCR2A, CCR4A, CCR5A, CCR7A, CCR13A, and CCR14A were ground using a mortar and pestle to create fine-grained powders (~10-12μm-diameter). The fine powders were then loaded on Whatman GF/C glass fiber filters using the Tubular Aerosol Suspension Chamber (TASC) method. This method is used to reduce preferred orientation and allow for a uniform particle distribution over the load area. The samples were loaded into a Philips PW-3710 X-ray diffractometer using a spinning stage pedestal and Cu-Kα X-ray source. The samples were run at 0.96 (~1) degree two-theta per minute from 4 to 64 degrees two-theta. Sample identification was conducted using a semi-automated search-match computer program (High Score) which utilizes a Joint Committee on Powder Diffraction Standards (JCPDS) and Crystallography Open (COD) databases; and manual identification using published reference patterns. Additionally, some of the

XRD patterns were overlain with unpublished reference patterns obtained at the University of West Georgia. Interpreted XRD patterns are presented in Attachment 2.

Bulk Geochemistry

Sixteen dried soil samples collected from CCR2A, CCR4A, CCR5A, CCR7A, CCR13A, and CCR14A were provided to American Assay Laboratory (AAL) in Sparks, Nevada for bulk geochemical elemental analysis. All 16 samples were placed in a drying oven at 90°C by AAL prior to analysis. After drying, samples were transferred into ring and puck shatterbox where samples were reduced to a fine powder (200 mesh). A 0.5-gram sample was then weighed and placed into Teflon sample tubes for acid digestion with HNO_3+HCl+HF+$HClO_4$ for 1 hour. Major, minor and trace element concentrations of the samples were determined by Inductively Coupled Plasma (ICP)- Mass Spectrometry (MS) using ICP-5AM48 protocol. Geochemical results are included as Attachment 3 and summarized on Table 1, presented in Section 3.0.

Scanning Electron Microscopy - SEM

The University of West Georgia Microscopy Center (WGMC) at the Department of Geosciences completed SEM analysis of five polished thin sections, one sample each from CCR2A, CCR7A, and CCR13A, and two samples from CCR14A. The selected thin sections were carbon-coated to reduce surface charging during SEM analysis. Qualitative backscattered electron imaging (BSE) and identification of potential Uranium (U)/Thorium (Th)-bearing accessory minerals in the coated polished thin-sections were conducted using the FEI Quanta 200 SEM instrument and attached Bruker EDX detector for semi-quantitative analysis. Analyses were completed using a 20 kilovolt (kV) accelerating voltage on the filament and a partial vacuum of 0.45 Torr in the sample chamber. Images, spectra, and elemental maps were collected, processed, and annotated using the Bruker ESPRIT software package. Images resulting from the SEM analyses are presented in Attachment 4.

3.0 RESULTS

Petrographic Analysis

Petrographic analysis was conducted on all 16 polished thin-sections to determine the major and minor mineralogy of each sample. Based on petrographic analysis of the upper sand, this unit is characterized by more than 95 volume percent detrital quartz, which is typically subangular to subrounded. Associated with the quartz are accessory minerals that include microcline, muscovite, staurolite, kyanite, zircon, rutile, and ilmenite. The matrix of the sand is variably comprised of kaolinite and eylettersite, and is locally cemented with wavellite.

Based on petrographic analysis of the lower clayey sand to sandy clay unit, this unit is characterized by subangular sand in a clayey matrix. Large rounded grains of collophane, marine fossils (Bryozoa and Molluska), and bone fragments also occur within this more clay-rich unit. Collophane is a massive cryptocrystalline apatite comprised of apatite, fluorapatite and hydroxyapatite. Typically, apatite-minerals are not optically isotropic; however, the cryptocrystalline nature of the collophane makes it optically isotropic in thin section. In one sample, CCR14A (28.3-28.6), dolomite is present in the clayey matrix. Accessory minerals include microcline, staurolite, ilmenite, and zircon.

Photomicrographs for selected samples are presented in Attachment 1.

Qualitative X-Ray Diffraction - XRD

X-Ray powder diffraction scans were completed on all 16 samples to identify the major minerals present. A limitation of XRD analysis is that the lower detection limit is approximately 4 to 5 weight percent. Therefore, diffraction peaks for accessory minerals that are less than approximately 5 weight percent of the rock are typically lost in the background. As previously discussed, the samples are loaded GF/C filters using an aerosol suspension chamber. This method of sample preparation reduces preferred orientation; however, it is a thin layer diffraction technique. Consequently, each of the XRD scans presented in Attachment 2 shows two aluminum peaks that represent the aluminum sample holder upon which the loaded filters are mounted; therefore, aluminum-metal is not contained in these samples.

Consistent with the petrographic analysis, XRD analysis indicates that mineralogy of the upper sand unit is primarily comprised of quartz with minor zircon. Kaolinite and wavellite were also observed, along with the presence of eylettersite occurring in increased concentration near the base of this unit.

The lower clay-rich unit is characterized by the occurrence of quartz, hydroxyapatite, fluorapatite, palygorskite, and minor wavellite. Additionally, the deepest sample, collected from CCR14A at 28.3-28.6 ft. bgs, contains dolomite. Annotated XRD scans for the selected samples are presented in Attachment 2.

Bulk Geochemistry

A summary of selected major, minor and trace elemental geochemistry of soil samples from CCR2A, CCR4A, CCR5A, CCR7A, CCR13A, and CCR14A is presented on Table 1. A complete listing of all geochemical data is presented in Attachment 3.

As indicated in these summary results, the radiogenic elements uranium and thorium were detected in all of the samples collected from the upper sand unit and lower clayey sand to sandy clay unit. The radiogenic elements rubidium and potassium were also detected in many of the samples.

Scanning Electron Microscopy - SEM

Petrographic and XRD analyses indicated the presence of minerals that are potentially radiogenic, and bulk geochemistry confirms the presence of radiogenic elements. Scanning Electron Microscopy was used to confirm the presence of the radiogenic elements detected in the bulk geochemistry in the radiogenic minerals identified in thin section and XRD patterns.

Radiogenic minerals identified from SEM analyses in representative sediment samples include the following:

Zircon
Ilmenite
Hydroxyapatite
Collophane
Rutile
Wavellite
Fluorapatite
Eylettersite

Energy dispersive spectroscopy (EDS), back scatter electron (BSE) images, and element maps of soil samples are presented as Attachment 4. In the BSE images, minerals that contain elements with low atomic numbers are shown in gray tones. Minerals that contain elements with large atomic numbers, generally show up as "bright" spots on the BSE image. Because uranium and thorium have atomic numbers of 92 and 90, respectively, minerals that contain these elements are "brighter" than the surrounding matrix.

Once a mineral with high atomic number elements was identified in the BSE image, the mineral was analyzed using energy dispersive spectroscopy. EDS is an analytical technique for elemental analysis based on x-ray emission caused by electrons that are dislodged from the inner orbitals by an x-ray beam from the instrument. As the inner electron is ejected from the inner shell, the electron hole is filled by electrons from higher-energy shells. This transformation from an outer- to an inner-shell releases energy in the form of an x-ray that can be detected and quantified. The energy of the x-ray is characteristic for different elements and can be displayed on an EDS spectrum as a function of electron volts (KeV). EDS and BSE plots for each sample analyzed is presented in Attachment 4.

Discussion

Based on review of historic aerial photographs, topographic maps and mine records, Golder has interpreted that the BSA and surrounding area are underlain by either fine-grained phosphatic mine tailings and/or unmined phosphate deposits. Results from visual observation, petrographic analysis, XRD analysis, bulk chemistry, and SEM analysis conducted for this work effort support this interpretation.

Two types of material were generally encountered in the six additional DPT borings advanced around the BSA. Based on the absence of glass (spherical or shards) in the thin sections or XRD patterns, and relatively low arsenic, beryllium and lithium concentrations, along with the high concentration of wavellite-cemented detrital quartz, microcline, zircon, staurolite, kyanite, ilmenite, and rutile, the upper sand unit encountered is not considered to represent coal combustion residuals (CCR). Although there is lithologic variability in this sand unit, there is no lateral continuity, giving the material a disturbed appearance; consequently, the absence of stratigraphy in a marine sand sequence and known land-use history indicates that this material likely represents backfilled materials, comprised of either removed and replaced overburden, unrecoverable ore, processed mine tailings, and/or mine waste. The underlying clayey-sand to sandy clay unit is interpreted to represent unmined, in-situ material, based on the occurrence of palygorskite, collophane apatite (with quartz inclusions), dolomitic carbonate, marine fossils, and bone fragments.

It is well-documented by Golder that phosphate deposits mined in this area contain naturally-occurring radiogenic minerals. Based on petrographic, XRD and SEM analysis, several potentially radiogenic minerals were identified in the soil samples collected, including: eylettersite (thorium-bearing aluminum phosphate); wavellite (uranium-bearing aluminum phosphate); collophane, apatite, hydroxyapatite, and fluorapatite (uranium-bearing calcium phosphates); and zircon, rutile, and ilmenite (uranium-bearing oxides). This is further supported by the detection of uranium concentrations up to 467ppm and thorium concentrations up to 23.4ppm in the bulk geochemistry, as summarized in Table 1 and presented in Attachment 3.

Radioactive decay products from naturally occurring radionuclides such as uranium and thorium are potential sources of Ra^{226} and Ra^{228}. Results from this investigation and regional mineral resource evaluations reveal significant uranium and other accessory constituents that are associated with the phosphate ore mined at and near the BSA. Published uranium concentrations in phosphate-bearing rocks have typical concentrations of up to 300 ppm, significantly exceeding concentrations reported for US coals and fly ash (USGS 1997). As shown on Table 1, naturally occurring radionuclides in phosphate ore and mine tailings surrounding the BSA are consistent with, and locally have higher concentrations of uranium than published concentrations in CCR.

Based on research conducted by Golder, the BSA is located in one of the most productive districts of the land-pebble phosphate mining in Florida. Because land-pebble deposits contain phosphates with elevated concentrations of uranium, this district was also of economic interest to the United States Atomic Energy Commission (USACE) (Cathcart, 1949). Uranium is associated in different ways with the aluminum phosphate and calcium phosphate mining zones that occur within these types of deposits. The upper sand unit encountered around the BSA, appears to represent materials originally derived from the aluminum phosphate zone, indicated by the presence of wavellite, eylettersite, and kaolinite. Materials located in the leached portions of the aluminum phosphate zone, originally formed by the downward migration of oxygen-rich acidic water, were noted to have uranium concentrated in the finest fraction (Cathcart, 1964). The principal fine fraction in the leached zone is kaolinitic clay and eylettersite.

The lower clayey-sand unit appears to represent the calcium phosphate zone, which was the target ore that was mined beneath the BSA. Cathcart (1964) described this zone as being comprised of unconsolidated sand, clayey sand, and sandy clay containing abundant nodules of calcium phosphate. We interpret the rounded collophane "balls" which consist of apatite, hydroxyapatite, and fluorapatite to represent the calcium phosphate nodules described by Cathart (1964). Samples from this zone represent unmined, in-situ material that are locally present beneath the BSA.

Based on the results of this work effort, multiple sources for naturally occurring uranium and thorium, and their decay products of Ra^{226} and Ra^{228}, were identified in the unconsolidated samples taken from the DPT borings advanced adjacent to monitoring wells installed around the BSA.

4.0 CLOSING

Petrologic Solutions appreciates the opportunity to work with Golder Associates on this project. Should you require additional information related to this evaluation, please do not hesitate to contact us.

Respectfully submitted,
PETROLOGIC SOLUTIONS INC.

Randy L. Kath

Randy Kath, PhD, PG
Senior Geologist and Principal

References:
Cathcart, J.B., 1964, Economic Geology of the Lakeland Quadrangle Florida. USGS Survey Bulletin 1162-G. US Government Printing Office, Washington.
USGS 1997. Radioactive Elements in Coal and Fly Ash: Abundance, Forms, and Environmental Significance. USGS Fact Sheet FS-163-97

Table 1. Summary of Selected Geochemical Data

Attachment 1: Photomicrographs of Sediment Samples
Attachment 2: Qualitative X-Ray diffraction scans
Attachment 3: Bulk Geochemistry
Attachment 4: SEM Backscatter Images and Associated EDS Spectra

Table 1: Summary of Selected Geochemical Data

Sample Number	*Depth (ft. BGS)*	Al_2O_3 wt%	TiO_2 wt%	Fe_2O_3 wt%	MgO wt%	MnO wt%	CaO wt%	K_2O wt%	NaO wt%	P_20_5 wt%
CCR2A	*18.7-19*	1.37	1.34	0.35	<MDL	0.01	0.10	0.06	0.01	0.47
CCR2A	*23-23.5*	9.22	1.06	0.50	0.05	0.01	0.51	0.13	0.02	2.29
CCR4A	*12.5-12.8*	0.42	0.50	0.08	<MDL	0.00	0.19	0.03	<MDL	0.05
CCR4A	*17-17.4*	3.75	0.62	0.13	0.05	0.00	0.20	0.06	0.02	0.67
CCR4A	*26.1-26.4*	9.12	0.36	0.45	0.10	0.01	23.38	0.36	0.13	>2.30
CCR5A	*19.3-20*	1.11	0.31	0.06	<MDL	0.00	0.13	0.04	0.03	0.22
CCR5A	*22.3-22.6*	9.32	0.42	0.34	0.05	0.00	0.48	0.10	0.03	1.10
CCR7A	*7-7.4*	0.59	0.51	0.10	<MDL	0.00	0.20	<MDL	<MDL	0.11
CCR7A	*14.6-15*	0.73	0.62	0.13	<MDL	0.01	0.08	<MDL	<MDL	0.16
CCR7A	*23.2-23.5*	8.70	0.51	0.71	0.05	0.00	0.90	0.07	0.20	>2.30
CCR13A	*9.4-10*	0.54	0.94	0.12	<MDL	0.00	0.41	<MDL	<MDL	0.13
CCR13A	*17.3-17.6*	4.12	0.36	0.16	0.03	0.00	0.26	0.05	<MDL	1.29
CCR13A	*27.8-28.2*	17.87	0.68	1.41	0.81	0.01	0.59	0.66	0.05	>2.30
CCR14A	*8.6-8.8*	7.61	0.46	0.42	0.14	0.00	1.05	0.13	0.02	2.13
CCR14A	*16.5-18*	11.95	0.53	0.50	0.08	0.01	0.72	0.18	0.02	>2.30
CCR14A	*28.3-28.6*	2.99	0.17	3.37	6.37	0.02	20.09	0.43	0.26	>2.30

Sample Number	*Depth (ft. BGS)*	As ppm	Be ppm	Cr ppm	Pb ppm	Rb ppm	Th ppm	U ppm	V ppm	Zr ppm
CCR2A	*18.7-19*	0.30	0.17	19.5	25.00	4.00	8.50	5.0	19.00	71.0
CCR2A	*23-23.5*	<MDL	1.22	42.9	29.00	6.00	12.90	50.4	59.00	70.2
CCR4A	*12.5-12.8*	<MDL	0.01	7.7	<MDL	<MDL	1.70	1.2	6.00	17.6
CCR4A	*17-17.4*	0.30	0.20	19.2	13.00	3.00	6.80	5.3	16.00	37.7
CCR4A	*26.1-26.4*	3.40	1.80	136.1	11.00	16.00	9.70	185.5	119.00	51.8
CCR5A	*19.3-20*	<MDL	0.05	6.6	6.00	2.00	2.10	4.1	5.00	15.9
CCR5A	*22.3-22.6*	0.70	1.22	49.6	24.00	5.00	8.20	34.2	35.00	44.0
CCR7A	*7-7.4*	0.60	0.05	7.9	4.00	<MDL	1.70	1.4	6.00	42.5
CCR7A	*14.6-15*	<MDL	0.05	10.1	4.00	<MDL	2.00	0.9	6.00	30.7
CCR7A	*23.2-23.5*	<MDL	0.93	50.5	22.00	3.00	8.80	35.0	33.00	60.9
CCR13A	*9.4-10*	0.40	0.04	11.4	16.00	<MDL	4.80	3.0	13.00	76.1
CCR13A	*17.3-17.6*	<MDL	0.49	23.4	12.00	3.00	6.30	22.4	25.00	43.5
CCR13A	*27.8-28.2*	0.20	1.58	162.8	21.00	41.00	23.40	164.4	247.00	167.2
CCR14A	*8.6-8.8*	<MDL	1.47	48.4	26.00	8.00	11.40	96.2	50.00	93.3
CCR14A	*16.5-18*	0.60	4.24	112.3	31.00	10.00	16.60	467.0	48.00	94.2
CCR14A	*28.3-28.6*	5.30	0.69	84.3	6.00	20.00	4.00	34.8	123.00	19.0

<MDL- less than method detection limit