GOLDER

October 15, 2018   15-26356.2

Mr. Carl Eldred, Esq.
Hopping Green & Sams
119 South Monroe Street, Suite 300
Tallahassee, FL 32301

RE: **STATISTICALLY SIGNIFICANT LEVEL EVALUATION**
          BYPRODUCT STORAGE AREA B – ST. JOHNS RIVER POWER PARK
          JACKSONVILLE, FLORIDA

Dear Mr. Eldred:

Golder Associates Inc. (Golder) is providing this Statistically Significant Level (SSL) evaluation summarizing the statistical analysis of the results from the initial annual and first semi-annual Coal Combustion Residual (CCR) Rule[1] assessment monitoring events for the Byproduct Storage Area B (BSA-B) at the St. Johns River Power Park (SJRPP).

For the initial annual assessment event, performed in March 2018, all Appendix IV parameters were sampled and analyzed in accordance with §257.95(a). For the subsequent semi-annual event, performed in June 2018, detected Appendix IV parameters from the annual event and all Appendix III parameters were sampled and analyzed. A statistical analysis of the Appendix IV results from the downgradient wells (CCR-4, CCR-5, CCR-6, and CCR-7) was performed to determine if the downgradient well concentrations are at SSLs relative to the groundwater protection standards (GWPS) established for the site. The statistical analysis was performed in accordance with the Statistical Analysis Plan for CCR Groundwater Monitoring (Golder, 2017).

One SSL above the GWPS has been identified for Radium 226+228 at CCR-6. Golder recommends proceeding to assessment of corrective measures in accordance with §257.95(g)(3)(i). Pursuant to §257.95(g)(1), a characterization of the nature and extent of the release is required.

Sincerely,

Golder Associates Inc.

Samuel F. Stafford, PE   Gregory M. Powell, PhD, PE
Senior Project Engineer   *Practice Leader and Principal*

SFS/GMP/ams

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[1] 40 Code of Federal Regulations (CFR) §257.50 to §257.107, as revised in Phase one, Part One, Final Rule, 83 Federal Register 36435 (July 30, 2018).