

May 6, 2020 19-124481

Mr. Matthew R. McClure

JEA 21 West Church Street Jacksonville, FL 32202

RE: STATISTICALLY SIGNIFICANT LEVEL EVALUATION

BYPRODUCT STORAGE AREA B - ST. JOHNS RIVER POWER PARK

JACKSONVILLE, FLORIDA

Dear Mr. McClure:

Golder Associates Inc. (Golder) is providing this Statistically Significant Level (SSL) evaluation summarizing the updated statistical analysis of the results from the December 2019 semi-annual Coal Combustion Residual (CCR) Rule¹ assessment monitoring events for the Byproduct Storage Area B (BSA-B) at the St. Johns River Power Park (SJRPP).

A statistical evaluation following the first annual and subsequent semi-annual event (June 2018) identified one SSL above the GWPS for Radium 226+228 at CCR-6. Statistical evaluations have been completed following receipt of results from semi-annual assessment monitoring events. The statistical analyses are performed in accordance with the Statistical Analysis Plan for CCR Groundwater Monitoring (Golder, 2017).

One additional SSL above the GWPS has been identified for Radium 226+228 at CCR-7 based on the updated statistical analysis of the sampling results from the December 2019 semi-annual sampling event. Golder recommends amending the assessment of corrective measures completed in June 2019 to incorporate this SSL.

Sincerely,

Golder Associates Inc.

Samuel F. Stafford, PE

Senior Project Engineer

Donald J. Miller

Principal and Practice Leader

SFS/DJM/ams

cc: Jaclyn Vu, JEA

Carl Eldred, Hopping Green and Sams

https://golderassociates.sharepoint.com/sites/110243/Project Files/6 Deliverables/SSL Evaluation/SJRPP BSA-B SSL Eval_Dec2019.docx

^{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).