

September 1, 2020

19-124481

Ms. Jaclyn Vu, PE

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 Ms. Vu:

Golder Associates Inc. (Golder) is providing this Statistically Significant Level (SSL) evaluation summarizing the updated statistical analysis of the results from the June 2020 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.

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). 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. A statistical evaluation following the December 2019 semi-annual assessment monitoring event identified Radium 226+228 at CCR-7 at SSL above the GWPS.

One additional SSL above the GWPS has been identified for Molybdenum at CCR-6 based on the updated statistical analysis of the sampling results from the June 2020 semi-annual sampling event. Golder recommends preparing a demonstration showing that a source other than the BSA is the cause of the new SSL within 90 days in accordance with §257.95(g)(3)(ii) or amending the assessment of corrective measures completed in June 2019 to incorporate this SSL.

Sincerely,

Golder Associates Inc.

Samuel F. Stafford, PE

Senior Engineer

Donald J. Miller

Principal and Practice Leader

SFS/DJM/ams

cc: Carl Eldred, Hopping Green and Sams

[https://golderassociates.sharepoint.com/sites/110243/Project Files/6 Deliverables/SSL Evaluation/SJRPP BSA-B SSL Eval_June2020_final.docx](https://golderassociates.sharepoint.com/sites/110243/Project%20Files/6%20Deliverables/SSL%20Evaluation/SJRPP%20BSA-B%20SSL%20Eval_June2020_final.docx)

¹ 40 Code of Federal Regulations (CFR) §257.50 to §257.107.