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February 8, 2023

Mrs. Laura Ward, Executive Director
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**Subject: Review of Response to Comments-Water Use Permits-Environmental Monitoring Report
Lockheed Martin Tallevast Site (Former American Beryllium Company Site)
1600 Tallevast Road
Tallevast, Manatee County, Florida
Project Number 1-1440-004**

Dear Mrs. Ward and Mrs. Washington:

RES Florida Consulting, LLC dba E Sciences (RES) is pleased to submit this letter responding to a January 12, 2023 response to comments (RTC) letter issued by Lockheed Martin addressed to the Southwest Florida Water Management District (SWFWMD). The RTC letter is in response to the SWFWMD's review of Lockheed Martin's annual Wetlands Monitoring Report (WMR) dated August 31, 2022 prepared for the Lockheed Martin Tallevast site (former American Beryllium Company) ("the Facility"). The Site consists of both the Facility and the surrounding area where groundwater is impacted by the chemicals of concern.

INTRODUCTION

The subject WMR was submitted as an appendix to Lockheed Martin's Remedial Action Summary Report (2022 RASR) dated October 27, 2022. Lockheed Martin submits RASRs to the Florida Department of Environmental Protection (FDEP) annually and RES reviews these documents on behalf of FOCUS to compile information and opinions regarding the ongoing remediation progress and regulatory reporting.

Historically our RASR reviews have focused on contaminant behavior, remediation system performance and related documentation. Recently, concerns surrounding the remediation system's impact on the wetlands within the Tallevast community have been raised. Therefore, we reviewed and provided comments on the WMR in our RASR review letter dated February 1, 2023.

It should be noted that RES periodically reviews the contents of FDEP's OCULUS document repository to keep FOCUS apprised of document postings that may be of interest. The subject January 12, 2023 RTCs letter was provided to FOCUS and then was created to OCULUS on January 31, 2022, after our review of the RASR and WMR. Further the SWFWMD letter was not posted to OCULUS. Therefore, the new information available in the RTC letter was not included in our 2022 RASR review letter. Both the February 1, 2023 RASR review letter and this letter collectively include our comments regarding the remediation system's impacts on wetlands.

The January 12, 2023 RTC letter raises additional concerns with the remediation system. Lockheed Martin states that the water discharge to the recovery trench RC-7002 was restarted on January 10, 2023. It is our understanding that discharges to RC-



7002 were discontinued to facilitate groundwater recovery of the plume that was located outside of the capture zone. As stated in our RASR review letter, it is our opinion that Lockheed Martin should evaluate the project impact to wetlands in a manner consistent with rules, requiring avoidance and minimization of impacts and mitigation as appropriate and we are encouraged that SWFWMD agrees. However, we are concerned that Lockheed Martin re-instated the discharge to infiltration gallery RC-7002 in reaction to a recently expressed concern about wetland impacts when the discharge to the infiltration gallery was discontinued to facilitate drawdown of the USAS for capture zone adjustments in the southeast portion of the Site.

We strongly recommend that the system adjustments needed to ensure full plume recovery are fully evaluated and immediately implemented to contain, recover and stop the plume spread, but that doing so should not be at the expense of the wetlands unless no other alternative exists and then mitigation must take place. These adjustments should be coordinated with FDEP and documented in writing so that they can be reviewed by the public. Additionally, the groundwater models should be re-run with the benefit of updated information and the regulatory agency should employ an expert to independently evaluate the model and proposed system modifications. The effectiveness and impacts of the system modifications should be demonstrated to meet their objectives and not create collateral damage before being implemented in lieu of, once again, waiting until the next RASR report is published.

We are also concerned about the statement in the RTC comment letter that the recent installation of a large stormwater retention pond has assisted the groundwater recovery treatment system capture. We did not identify any documentation of analysis or modeling on OCULUS that substantiates this claim. While we acknowledge that a groundwater sample collected near that pond did show concentrations of 1,4-dioxane below the cleanup target level, the statement that the stormwater pond is beneficial may be an oversimplification. Using this simplistic view, it is possible that stormwater could create localized lateral plume movement but this is a complex system. The contaminant concentrations in the lower aquifer system have not been delineated and potential effects to vertical plume movement is quite possible. Lockheed Martin should provide detailed field testing and modeling to confirm their claims and confirm that the influx of stormwater from the pond is not exacerbating plume movement in all aquifer zones. This analysis will require that the vertical and horizontal extent of the plume be delineated.

According to the RTC letter, FDEP's ERP section provides review of each WMR. However, we urge the State of Florida (SWFWMD or FDEP) to require a full assessment of the wetland conditions for each reference and target wetland that was to be monitored per the originally approved wetland monitoring plan. As has been demonstrated over the years, what was originally proposed by Lockheed Martin and approved by FDEP has substantially changed and this warrants an updated review and evaluation of existing conditions and mitigation requirements. We appreciate the opportunity to offer our professional services to you. If you have any questions concerning our evaluation, please contact us at 954-484-8500.

Sincerely,

RES Florida Consulting, LLC

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Cc: Ms. Jeanne Zokovitch Paben