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November 10, 2023

Mrs. Laura Ward, Executive Director
Mrs. Wanda Washington, Executive Director
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**Subject: Response to Lockheed Martin's October 24, 2023 Letter
Lockheed Martin Tallevast Site (Former American Beryllium Company Site)
1600 Tallevast Road
Tallevast, Manatee County, Florida
Project Number PRJ108482
FDEP Site ID# ERIC_11531**

Dear Mrs. Ward and Mrs. Washington:

RES Florida Consulting, LLC dba E Sciences (RES) has prepared this letter in response to Lockheed Martin Corporation's October 24, 2023 letter (subject letter) that was prepared in response to 2022 Remedial Action Status Report comments issued by FDEP in a letter dated June 30, 2023. Based on the subject letter, Lockheed Martin met with FDEP on September 22, 2023 to discuss comment numbers 1 and 3 of the June 30th letter and this is their formal response to those comments.

Our concern relates to the response to comment number 3 which states that although FDEP told Lockheed Martin on two occasions to conduct direct push assessment in the area of private residences and FDEP's statements that it is important for the owners of the private residences to know what the levels of groundwater contamination are beneath their properties, Lockheed Martin asserts that the assessment is not warranted.

Lockheed Martin asserts this opinion because it conducted some direct push assessment in 2004 and installed a large amount of monitoring wells (in 2005 and 2006) and spaced to "establish the horizontal and vertical boundaries" within each impacted stratigraphic unit of the 200 acre plume. They further state that FDEP approved a SARA 3 document on September 25, 2006.

The figures Lockheed Martin provided as evidence of adequate assessment show the monitoring wells in the upper surficial aquifer system in the residential area are VP-19 and VP-44. The shallowest depth interval for VP-19 was 38-43 feet. The shallowest test at VP-44 was 20 feet and showed high levels of PCE and TCE, but there is no shallower data. Further, no 1-4-dioxane was included in the analytical suite. Lockheed Martin is not presenting data that is representative of the shallow groundwater beneath the residences. The data was collected for a different purpose nearly 20 years ago and in an area where substantial groundwater contamination movement has been ongoing since RAP implementation. This information is not adequate for the owners or private residents to know what levels of groundwater are beneath their properties.

In 2011, when the community expressed concern to the State over the inadequacy of the internal plume assessment upon completion of the 2023 SARA, the State acknowledged that although the assessment was not complete and that additional assessment would be required, they approved the SARA to allow Lockheed Martin to move forward with remedial action



planning. Internal plume assessment has not been conducted except as part of the remedial action reporting which is insufficient for the community to evaluate conditions beneath their properties. We highlight this because the FDEP does have the authority to require additional assessment, even during remediation, as appropriate. This is contrary to Lockheed Martin's implication that an approved site assessment document supports their statement that additional assessment in this area is not warranted.

We would like to reiterate our appreciation for FDEP's concurrence that additional assessment in the USAS is warranted in the area south and east of the Lockheed Martin facility and that they have requested that Lockheed Martin conduct direct push assessment in the area between EW-2035 and MW-27. There are no static monitoring wells near EW-2035 so the groundwater contaminant concentrations are not known. We recommend that a direct push assessment plan be developed for community and FDEP input prior to conducting the assessment. Those well locations are spaced about 700 feet apart and the residential area is largely unassessed. It is our opinion that a 100-foot spaced grid to identify the location of contamination is appropriate and that it should also extend onto the residential properties where people live. Therefore, we recommend that direct push testing also be conducted on residential properties located between 17th Street E, 17th Street Court East, Tallevast Road and 78th Drive East on a 100-foot grid spacing. FOCUS would be willing to assist Lockheed Martin with obtaining site access agreements with the individual homeowners to facilitate this necessary assessment. Further, all groundwater samples in this area should include samples collected from the top of the water table and tested for all COCs to assist in evaluating potential for vapor encroachment impacts to the residents of the community.

We appreciate the opportunity to offer our professional services to you. If you have any questions concerning this letter, please contact us at 954-484-8500.

Sincerely,

RES Florida Consulting, LLC

Kathryn Eisnor
Senior Scientist

Nadia G. Locke, P.E.
Senior Engineer

Cc: Ms. Jeanne Zokovitch Paben