

From: **Jeanne Zokovitch Paben** <jeanne.pabenlaw@gmail.com>

Date: Thu, Jul 25, 2024 at 2:13 PM

Subject: Lockheed Contamination in Tallevast: Comments from Ramboll on Mike Bland's Memo Reviewing Lockheed's 2023 RASR and RAIs and Responses

To: Bland, Mike <Mike.Bland@floridadep.gov>, <philip.wilkerson@floridadep.gov>, Sellers, Robert <Robert.Sellers@floridadep.gov>, Smith, Leah J. <Leah.J.Smith@floridadep.gov>, Bahr, Tim <Tim.Bahr@floridadep.gov>

Mike and Bob,

On behalf of Laura Ward and Wanda Washington as Co-Executive Directors of FOCUS and the Tallevast community attached are comments from Rob Powell at Ramboll, the community's technical consultant under Lockheed's Consent Order with the state, after reviewing Mike's memo to the District for his review of Lockheed's 2023 RASR and subsequent RAIs and Responses. As you can see in this letter, Dr. Powell and the community remain critically concerned about a number of issues, which are summarized below. In addition to Dr. Powell's letter FOCUS has outlined here the most pressing issues raised in Dr. Powell's letter as well as needed action by FDEP and Lockheed.

1. **Lockheed's inability to clean up its contamination as approved in its 2013 Remedial Action Plan Addendum,**
2. **Lockheed ignoring FDEPs requests for additional assessment of the contamination particularly as it relates to**
 - a) **the SE boundary only recently delineated,**
 - b) **the unassessed and under assessed densely residential populated areas to the near E/S/SE of the source property, and**
 - c) **deficiencies in its Wetlands program in TW-6.**
3. **Related, while we appreciate FDEP holding Lockheed accountable for these deficiencies by way of instructions/orders, we are very concerned about**
 - a) **the timeline with which it takes Lockheed to implement such instructions/orders,**
 - b) **Lockheed's constant efforts to push back on some of these instructions/orders, and**
 - c) **Lockheed's misrepresentation of development in the Tallevast area as a means to avoid timely taking some of these actions.**

FDEP **must be clear** with Lockheed that **these are not optional suggestions but mandatory actions which must be performed timely and effectively**. For e.g. FDEP has requested the additional assessment in the densely populated residential area to the E/S/SE for almost two years and yet Lockheed has done nothing but indicate that they do not believe it is necessary. Nowhere in the records has FDEP agreed with this assertion, and yet no progress has been made. As we have raised in earlier comments, **being confident that the shallow groundwater contamination is accurately defined underneath residents is critical for effective cleanup as well as to prevent additional risks of exposure to residents, many who were likely exposed to this contamination for decades**. (“likely” simply because we do not know the exact timeframe of when the contamination began infiltrating nearby wells because there was no testing until the 1990s).

Additionally, the community is devastated to learn that **PFAS** has now been found in the community and that **its source dates back decades as does FDEPs knowledge of it**. The community is further horrified that they **had to find out about it through private landowners on the edge of the community. And the community is shocked that FDEP has sent us no information on this issue, even after requested. Instead, scientists FOCUS is supporting to perform brownfields work in the community had to find these reports and share them with us**.

The latest report indicates that the **PFAS has been found within both Lockheed’s plume and capture zone**, and that Lockheed wells are being sampled for this, and **yet again there has been no notification to the community**, nor is there any information on this in FDEP’s OCULUS database in Lockheed’s site materials.

For all of the above reasons, we again **reiterate our ongoing requests for community meetings with both FDEP and Lockheed on its contamination and FDEP on the PFAS issue**.

It has been ten+ years since the Lockheed system began operating, and Lockheed's own data demonstrated that the plume was already moving differently than it predicted even prior to constructing the remedial system. Despite us raising concerns that the plume was not properly delineated and that the cleanup system therefore was not designed to address all of the contamination prior to FDEPs approval and in a subsequent DOAH challenge, it took 5 years of additional operating data from Lockheed before FDEP was convinced that Lockheed did not have control of its entire plume, and then a couple more years before Lockheed actually took action to delineate the Southeastern edge of the plume. Failing to hold Lockheed accountable allowed and may still be allowing contamination to grow, impact, and threaten additional risk.

Further, the failure to notify the community about the PFAS contamination and its interaction with Lockheed's contamination and cleanup is an egregious error that must be remedied immediately.

Please respond to both this email and Dr. Powell's recent letter as soon as possible, and please let us know when you can attend a meeting with the community on these issues in the next 30 days. We look forward to hearing from you at this critical time.

Sincerely,
Jeanne
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