

Lockheed Martin Corporation
6801 Rockledge Drive, CLE-610, Bethesda, MD 20817
Telephone 240-676-5392



August 22, 2008

Ms. Deborah A. Getzoff
District Manager
Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 3337-0926

Re: Warning Letter, August 3, 2008 Incident
Former American Beryllium Company Site
1600 Tallevast Road, Tallevast, FL
OGC #04-1328

Dear Ms. Getzoff:

This letter responds to your Warning Letter of August 4, 2008 concerning the August 3, 2008 overflow of groundwater from the interim groundwater treatment system and the response actions taken at the Former American Beryllium Company Site in Tallevast, Florida. Lockheed Martin Corporation (Lockheed Martin) was notified of the release at 3:06 PM on Sunday, August 3. Lockheed Martin's contractor shut off the groundwater treatment system remotely at 3:20 pm, within 15 minutes of being alerted to the overflow of the secondary containment system. Lockheed Martin regrets that this overflow occurred, and has investigated its causes. We understand that this release raises significant issues and we are taking serious steps to address them. We look forward to meeting with you to discuss these events and our response. We will not restart this system without your approval.

Below we provide the Incident Report required by our Operations, Maintenance and Monitoring Manual, Appendix F (Contingency Plan) and also the information required by Rule 62-780.500. Thereafter we address the issues raised in your Warning Letter.

Incident Report

The following information is required by Section 2.2 of Appendix F (Contingency Plan). It also fulfills the reporting requirements of Rule 62-780.500.

Date, time, and type of incident

Based on information provided by community members, sometime between 11:30 a.m. and 1:30 p.m. on Sunday, August 3, 2008, a release of pumped groundwater from the secondary containment unit of the interim groundwater treatment system was observed at the Former American Beryllium Company Site located at 1600 Tallevast Road.

Type and quantity of material(s) involved

The exact time the release began is unknown, but it probably started sometime during the morning of Sunday, August 3. We estimate that approximately 5,000 gallons of pumped groundwater were released from the secondary containment unit of the surge tank of the interim groundwater treatment system. Based on the most recent influent concentration data (June 2008), the concentrations of the contaminants of concern (COCs) in the pumped groundwater are estimated as follows: 1,4-dioxane (0.21 mg/l), tetrachloroethene (PCE) (0.14 mg/l), trichloroethene (TCE) (0.4 mg/l), 1,1-dichloroethane (0.06 mg/l), 1,1-dichloroethene (0.22 mg/l), and cis-1,2-dichloroethene (0.029 mg/l). A table showing the influent concentrations from the June 2008 sampling event is provided in Attachment A.

The extent of injuries, if any

The release resulted in no injuries.

An assessment of actual or potential hazards to human health or the environment, where applicable

Human Health

On Sunday August 3, 2008, Environ International (Environ), an independent consultant working on behalf of the Tallevast community, conducted air monitoring to determine if there were any volatile organic compounds (VOCs) present in air in the vicinity of the release. The air monitoring began at approximately 5:21 p.m. The air monitoring was conducted using a RAE Systems Photoionization Detector (PID) model ppbRAE Plus. This model is capable of detecting VOCs in the parts per billion (ppb) range. The results of the air monitoring conducted on August 3, 2008 indicate that no VOCs were detected. A print out of the results is provided in Attachment B.

Environmental Impacts

Soil and groundwater samples were collected in the vicinity of the spill area at the locations shown on Figure 1 in Attachment C. The sample locations were generally laid out as a grid pattern in and adjacent to the area impacted by the spill. Sample location SP-3 is at the center of the spill area and other sample locations are spaced at about 10-foot intervals from that point. There were a total of 17 sample locations as part of this sampling event.

Four soil samples were collected at each sample location from above the groundwater table, which is approximately 5 to 6 feet below land surface (bls). The first soil sample was collected from the top 6 inches of soils. Subsequent samples were collected in 2-foot intervals down to the groundwater table (i.e., 0.5 to 2 feet bls, 2 to 4 feet bls and 4 to 6 feet bls). Soil samples were collected by a hand-auger method following the procedures in Florida Department of Environmental Protection (FDEP) Standard Operating Procedure (SOP) #FS3000.

Groundwater samples were collected in 5-foot intervals starting at the groundwater table (approximately 5 to 6 feet bls) and ending at the top of the hard streak (approximately 30 feet bls). This resulted in 5 groundwater samples per location. Groundwater samples were collected using a Geoprobe direct push sampler. A probe was pushed to the bottom of the desired interval and the probe was retracted slightly to deploy an integral well screen into the zone. A groundwater sample was collected from the screened area utilizing a peristaltic pump and dedicated tubing. All groundwater samples were collected following FDEP SOP #FS2200.

All samples were analyzed by TestAmerica in Tampa, Florida using United States Environmental Protection Agency (USEPA) Method 8260B for VOCs and USEPA Method 8260C with heated purge, selective ion monitoring (SIM) and isotope dilution (ID) for 1,4-Dioxane. The analytical results for soil and groundwater samples are presented on Figures 1 and 2, respectively, in Attachment C.

Soil Results

The results of the soil samples were compared to the Residential Direct Exposure Limits, Commercial/Industrial Direct Exposure Limits and the Leachability Standards based on Groundwater Clean-up Target Levels (GCTLs). As shown on Figure 1 in Attachment C, the results for soil samples at all 17 locations were several orders of magnitude below the Residential and Commercial/Industrial Direct Exposure Limits. The results for the top two feet of soil at all 17 sample locations were below the Leachability Standards based on GCTLs. In 7 of the sample locations in or near the spill area, the concentration of 1,4-dioxane was above the Leachability Standards based on GCTLs in the sample interval immediately above the water table. These results demonstrate that this soil is likely being impacted from concentrations of 1,4-Dioxane in the groundwater.

Groundwater Results

The results indicate that site related COCs are present in the shallow groundwater in the immediate vicinity of the release (Figure 2, Attachment C). Specifically, site related COCs were detected above GCTLs in 10 of the 17 samples collected from the 5 to 9 feet bls interval, and two of the 17 samples collected from the 10 to 14 feet bls interval. Isoconcentration contours for TCE and 1,4-Dioxane in the 5 to 9 feet bls interval and the 10 to 14 feet bls interval are shown on Figures 3 and 4, respectively, in Attachment C. Site related COCs were detected above GCTLs in one sample collected from the 15 to 19 feet bls interval, one sample from the 20 to 24 feet bls interval, and one sample from the 25 to 29 feet bls interval.

The results of the investigation indicate that the release from the secondary containment unit has impacted the shallow groundwater in the immediate vicinity of the spill. The maximum distance from the point of the release that impacts were detected was approximately 30 feet. Concentrations of all COCs were non detect in all samples collected further than 30 feet from the point of the release. These results show that the impacts are confined to the site and have not migrated off the property.

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Lockheed Martin plans to install shallow monitoring wells in the vicinity of the release to monitor the impacts to groundwater. In addition, Lockheed Martin is currently evaluating alternatives to remediate the impacts to shallow groundwater. Lockheed Martin will provide a plan describing these activities to the FDEP in the near future.

Estimated quantity and disposition of recovered materials and a description of subsequent cleanup activity

Following notification to Paul Calligan of the release at 3:06 PM on Sunday, August 3, Lockheed Martin's contractor shut down the groundwater treatment system remotely at 3:20 pm. Upon arrival of personnel at the site, it was noted that the secondary containment unit was nearly full of water. Some pumped groundwater that had overflowed the secondary containment unit apparently had infiltrated nearby on-site soils. As indicated above, the impact from the release was confined to the site.

In response to the release, a waste disposal contractor, Southern Waste Services (SWS) was brought on-site to remove the water from within the secondary containment unit. Approximately 6,000 gallons of water was pumped from the secondary containment unit on Sunday August 3, 2008 and taken off site for proper disposal. The remaining water (approximately 3,500 gallons) was pumped from the secondary containment by SWS on Monday August 4, 2008 and taken off site for proper disposal. The system will remain shut down until repairs are made and Lockheed Martin receives approval from the FDEP to restart the system.

Legal Issues Raised by FDEP

In your August 4 letter, you raise several issues under Florida law concerning the August 3 release at the Tallevast site. We take these matters seriously, and we address each of them below.

- 1) **Release of hazardous substance, Fla. Stat. § 376.302(1)(a).** This provision of the Florida Statutes prohibits discharge of hazardous substances into or upon the surface or ground waters of the state, "which . . . violates any departmental 'standard'" as defined by Section 403.803(13) of the Florida Statutes. Laboratory analytical results have shown that several on-site groundwater samples within approximately 25 feet from the spill location exceeded groundwater standards adopted by rule 62-520.420(1): (1) TCE levels exceeded the standard in six locations at a depth of 5-9 feet, (2) 1, 1-DCE levels exceeded the standard in four locations at a depth of 5-9 feet, (3) PCE levels exceeded the standard in one location at a depth of 25-29 feet. We do not expect that these exceedances will cause a violation of these standards at any private or public water supply well. See Rule 62-520.420(5). The release did not contain the threshold quantities of constituents that need to be reported pursuant to FDEP regulations. See Fla. Admin. Code Ann. r. 62-150.300. The release is not unlawful under Section 376.302(1)(a) for exceeding the FDEP's groundwater cleanup contaminant criteria because those criteria are not considered "standards" under Florida law. See Fla. Admin. Code Ann. r. 62-777.150(7).

- 2) **Failure to operate the treatment system in accordance with the Interim Removal Action approval pursuant to Consent Order #04-1328, Fla. Stat. § 376.302(1)(b).** This provision of the Florida Statutes prohibits a failure “to comply with any statute, rule, order, permit, registration, or certification adopted or issued by the” FDEP. Lockheed Martin is reviewing its operation and maintenance procedures for the groundwater treatment system and will submit a plan to FDEP by September 19, 2008 describing the corrective actions that will be taken. The corrective actions will be implemented before the system is restarted.
- 3) **Failure to maintain a required pollution control system or device, Fla. Stat. § 403.121(4)(b).** This provision of the Florida Statutes gives the FDEP authority, in an administrative proceeding, to assess an administrative penalty in the amount of \$4,000 for a “failure to install, maintain, or use a required pollution control system or device.” Lockheed Martin is reviewing its operation and maintenance procedures for the groundwater treatment system and will submit a plan to FDEP by September 19, 2008 describing the corrective actions that will be taken. The corrective actions will be implemented before the system is restarted.
- 4) **Failure to make required notification to the Department and to adequately respond to an emergency, Fla. Stat. § 403.121(4)(e).** This provision of the Florida Statutes gives the FDEP authority, in an administrative proceeding, to assess an administrative penalty in the amount of \$1,000 for, among other things, a “failure to adequately respond to emergencies to bring an emergency situation under control” or a “failure to submit required notification to the department.” Although Lockheed Martin responded appropriately in all other respects to the discovery of the August 3 release, we agree that Lockheed Martin did not notify the State Warning Point spill hotline in a timely fashion. We are taking steps to make sure that this error will not be repeated in the event that a reportable incident occurs in the future.
- 5) **Treatment system modification and construction was not approved as required, Fla. Stat. § 376.302(1)(b).** This provision of the Florida Statutes prohibits a failure “to comply with any statute, rule, order, permit, registration, or certification adopted or issued by the” FDEP. Lockheed Martin has reviewed the terms of its proposed Interim Remedial Action modification, which was approved by the FDEP on July 3, 2007, and has discovered that, rather than installing the proposed piping for use in the interim groundwater treatment system, a flexible PVC hose was installed in its place based on a decision made in the field. Lockheed Martin will assure that any modifications to the approved plans will be submitted to FDEP for its approval.

Next Steps

In response to this event, Lockheed Martin has assembled a team of technical experts to review the design/construction and operation and maintenance practices for the groundwater treatment

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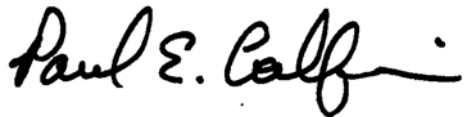
system in order to develop a corrective action plan that will ensure that future releases will not occur. Areas to be reviewed include but are not limited to:

- Location of aeration piping system and materials of construction
- Structural evaluation of secondary containment systems
- Verification of as built construction drawings
- Appropriate level of redundancy for safety systems
- Inspection schedule for critical control devices
- Appropriate staffing level for the treatment system
- Emergency response/contingency plans

Lockheed Martin will complete this evaluation and submit a detailed corrective action plan for review by the Department by September 19, 2008. Implementation of the corrective actions is expected to take approximately one month from the date of Department approval.

If you have any questions, please contact me by telephone at 240-676-5392, or via e-mail at paul.calligan@lmco.com.

Sincerely,



Project Lead

cc:

Larry Morgan, FDEP OGC
Brian Dougherty, FDEP BWC
Laura Ward, President, FOCUS
Wanda Washington, Vice President, FOCUS
Tim Varney, Environ, Inc.
Emerson Carey, Carey and Dobson, Atlanta
Randy Merchant, FDOH
Robert Brown, Manatee County
Gladys Branich, Manatee County
Ed Cottingham
Garrett Smith
Jeanne Zokovitch
Michael Graves

Attachment A

Groundwater Treatment System Influent Concentrations

**TABLE 1
ANALYTICAL RESULTS - SYSTEM INFLUENT**

**INTERIM REMEDIAL ACTION SYSTEM
FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA**

(Results are presented in parts per million, mg/L)

Parameter	Units	06/12/08
1,4-Dioxane	mg/L	0.21
1,1-Dichloroethane	mg/L	0.06
1,1-Dichloroethene	mg/L	0.22 D
cis-1,2-Dichloroethene	mg/L	0.029
Tetrachloroethene	mg/L	0.14
Trichloroethene	mg/L	0.4 D
Vinyl Chloride	mg/L	0.0014
Aluminum	mg/L	0.072 I
Arsenic	mg/L	0.0048 U
Beryllium	mg/L	0.00074 U
Cadmium	mg/L	0.00071 U
Chromium	mg/L	0.0017 U
Copper	mg/L	0.0029 U
Iron	mg/L	13
Lead	mg/L	0.0016 U
Nickel	mg/L	0.0047 U
Zinc	mg/L	0.0059 U

Notes:

1. Samples collected from equalization tank discharge. Analyzed parameters the same as for system effluent specified in Manatee County Utility Operations Department Office of Industrial Compliance (MCUO) Permit IW0025S.
2. D - Concentration is based on a diluted sample analysis.
3. I - The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
4. U - Indicates that a compound was analyzed for but not detected. The value associated with the qualifier is the laboratory method detection limit.
5. Results are based on validated analytical reports from the laboratory.

Attachment B

Air Monitoring Results

Community Center Station Aug. 3, 2008

Instrument: ppBRAE (PGM7240)

Serial Number: 102326

User ID: TallB

Site ID: Tallev49

Data Points: 791

Gas Name: Isobutylene

Sample Period: 60 sec

Last Calibration Time: 08/01/2008 06:00

Start At: 08/03/2008 17:21 End At: 08/04/2008 06:31

Measurement Type:	Min(ppb)	Avg(ppb)	Max(ppb)
High Alarm Levels:	10000	10000	10000
Low Alarm Levels:	5000	5000	5000
STEL Alarm Levels:	25000	25000	25000
TWA Alarm Levels:	10000	10000	10000

Measurement Type:	Min(ppb)	Avg(ppb)	Max(ppb)
Peak Data Value:	0	0	0
Min Data Value:	0	0	0
TWA Data Value:	0	0	0
AVG Data Value:	0	0	0

Instrument: ppbRAE (PGM7240)

Serial Number: 102326

User ID: TallB

Site ID: Tallev49

Data Points: 791

Gas Name: Isobutylene

Sample Period: 60 sec

Last Calibration Time: 08/01/2008 06:00

Measurement Type:	Min(ppb)	Avg(ppb)	Max(ppb)
High Alarm Levels:	10000	10000	10000
Low Alarm Levels:	5000	5000	5000

Line#	Date	Time	Min(ppb)	Avg(ppb)	Max(ppb)
1	08/03/2008	17:21	0	0	0
2	08/03/2008	17:22	0	0	0
3	08/03/2008	17:23	0	0	0
4	08/03/2008	17:24	0	0	0
5	08/03/2008	17:25	0	0	0
6	08/03/2008	17:26	0	0	0
7	08/03/2008	17:27	0	0	0
8	08/03/2008	17:28	0	0	0
9	08/03/2008	17:29	0	0	0
10	08/03/2008	17:30	0	0	0
11	08/03/2008	17:31	0	0	0
12	08/03/2008	17:32	0	0	0
13	08/03/2008	17:33	0	0	0
14	08/03/2008	17:34	0	0	0
15	08/03/2008	17:35	0	0	0
16	08/03/2008	17:36	0	0	0
17	08/03/2008	17:37	0	0	0
18	08/03/2008	17:38	0	0	0
19	08/03/2008	17:39	0	0	0
20	08/03/2008	17:40	0	0	0
21	08/03/2008	17:41	0	0	0
22	08/03/2008	17:42	0	0	0
23	08/03/2008	17:43	0	0	0
24	08/03/2008	17:44	0	0	0
25	08/03/2008	17:45	0	0	0
26	08/03/2008	17:46	0	0	0
27	08/03/2008	17:47	0	0	0
28	08/03/2008	17:48	0	0	0
29	08/03/2008	17:49	0	0	0
30	08/03/2008	17:50	0	0	0
31	08/03/2008	17:51	0	0	0
32	08/03/2008	17:52	0	0	0
33	08/03/2008	17:53	0	0	0
34	08/03/2008	17:54	0	0	0
35	08/03/2008	17:55	0	0	0
36	08/03/2008	17:56	0	0	0
37	08/03/2008	17:57	0	0	0
38	08/03/2008	17:58	0	0	0
39	08/03/2008	17:59	0	0	0
40	08/03/2008	18:00	0	0	0
41	08/03/2008	18:01	0	0	0
42	08/03/2008	18:02	0	0	0
43	08/03/2008	18:03	0	0	0
44	08/03/2008	18:04	0	0	0
45	08/03/2008	18:05	0	0	0
46	08/03/2008	18:06	0	0	0
47	08/03/2008	18:07	0	0	0
48	08/03/2008	18:08	0	0	0
49	08/03/2008	18:09	0	0	0
50	08/03/2008	18:10	0	0	0
51	08/03/2008	18:11	0	0	0
52	08/03/2008	18:12	0	0	0
53	08/03/2008	18:13	0	0	0
54	08/03/2008	18:14	0	0	0
55	08/03/2008	18:15	0	0	0
56	08/03/2008	18:16	0	0	0
57	08/03/2008	18:17	0	0	0
58	08/03/2008	18:18	0	0	0

59	08/03/2008	18:19	0	0	0
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81	08/03/2008	18:41	0	0	0
82	08/03/2008	18:42	0	0	0
83	08/03/2008	18:43	0	0	0
84	08/03/2008	18:44	0	0	0
85	08/03/2008	18:45	0	0	0
86	08/03/2008	18:46	0	0	0
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117	08/03/2008	19:17	0	0	0
118	08/03/2008	19:18	0	0	0
119	08/03/2008	19:19	0	0	0
120	08/03/2008	19:20	0	0	0
121	08/03/2008	19:21	0	0	0
122	08/03/2008	19:22	0	0	0
123	08/03/2008	19:23	0	0	0
124	08/03/2008	19:24	0	0	0
125	08/03/2008	19:25	0	0	0
126	08/03/2008	19:26	0	0	0
127	08/03/2008	19:27	0	0	0

128	08/03/2008	19:28	0	0	0
129	08/03/2008	19:29	0	0	0
130	08/03/2008	19:30	0	0	0
131	08/03/2008	19:31	0	0	0
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135	08/03/2008	19:35	0	0	0
136	08/03/2008	19:36	0	0	0
137	08/03/2008	19:37	0	0	0
138	08/03/2008	19:38	0	0	0
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141	08/03/2008	19:41	0	0	0
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145	08/03/2008	19:45	0	0	0
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166	08/03/2008	20:06	0	0	0
167	08/03/2008	20:07	0	0	0
168	08/03/2008	20:08	0	0	0
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173	08/03/2008	20:13	0	0	0
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178	08/03/2008	20:18	0	0	0
179	08/03/2008	20:19	0	0	0
180	08/03/2008	20:20	0	0	0
181	08/03/2008	20:21	0	0	0
182	08/03/2008	20:22	0	0	0
183	08/03/2008	20:23	0	0	0
184	08/03/2008	20:24	0	0	0
185	08/03/2008	20:25	0	0	0
186	08/03/2008	20:26	0	0	0
187	08/03/2008	20:27	0	0	0
188	08/03/2008	20:28	0	0	0
189	08/03/2008	20:29	0	0	0
190	08/03/2008	20:30	0	0	0
191	08/03/2008	20:31	0	0	0
192	08/03/2008	20:32	0	0	0
193	08/03/2008	20:33	0	0	0
194	08/03/2008	20:34	0	0	0
195	08/03/2008	20:35	0	0	0
196	08/03/2008	20:36	0	0	0

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199	08/03/2008	20:39	0	0	0
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203	08/03/2008	20:43	0	0	0
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228	08/03/2008	21:08	0	0	0
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625	08/04/2008	03:45	0	0	0
626	08/04/2008	03:46	0	0	0
627	08/04/2008	03:47	0	0	0
628	08/04/2008	03:48	0	0	0
629	08/04/2008	03:49	0	0	0
630	08/04/2008	03:50	0	0	0
631	08/04/2008	03:51	0	0	0
632	08/04/2008	03:52	0	0	0
633	08/04/2008	03:53	0	0	0
634	08/04/2008	03:54	0	0	0
635	08/04/2008	03:55	0	0	0
636	08/04/2008	03:56	0	0	0
637	08/04/2008	03:57	0	0	0
638	08/04/2008	03:58	0	0	0
639	08/04/2008	03:59	0	0	0
640	08/04/2008	04:00	0	0	0
641	08/04/2008	04:01	0	0	0
642	08/04/2008	04:02	0	0	0
643	08/04/2008	04:03	0	0	0
644	08/04/2008	04:04	0	0	0
645	08/04/2008	04:05	0	0	0
646	08/04/2008	04:06	0	0	0
647	08/04/2008	04:07	0	0	0
648	08/04/2008	04:08	0	0	0
649	08/04/2008	04:09	0	0	0
650	08/04/2008	04:10	0	0	0
651	08/04/2008	04:11	0	0	0
652	08/04/2008	04:12	0	0	0
653	08/04/2008	04:13	0	0	0
654	08/04/2008	04:14	0	0	0
655	08/04/2008	04:15	0	0	0
656	08/04/2008	04:16	0	0	0
657	08/04/2008	04:17	0	0	0
658	08/04/2008	04:18	0	0	0
659	08/04/2008	04:19	0	0	0
660	08/04/2008	04:20	0	0	0
661	08/04/2008	04:21	0	0	0
662	08/04/2008	04:22	0	0	0
663	08/04/2008	04:23	0	0	0
664	08/04/2008	04:24	0	0	0
665	08/04/2008	04:25	0	0	0
666	08/04/2008	04:26	0	0	0
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668	08/04/2008	04:28	0	0	0
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670	08/04/2008	04:30	0	0	0
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676	08/04/2008	04:36	0	0	0
677	08/04/2008	04:37	0	0	0
678	08/04/2008	04:38	0	0	0
679	08/04/2008	04:39	0	0	0

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681	08/04/2008	04:41	0	0	0
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683	08/04/2008	04:43	0	0	0
684	08/04/2008	04:44	0	0	0
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687	08/04/2008	04:47	0	0	0
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689	08/04/2008	04:49	0	0	0
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699	08/04/2008	04:59	0	0	0
700	08/04/2008	05:00	0	0	0
701	08/04/2008	05:01	0	0	0
702	08/04/2008	05:02	0	0	0
703	08/04/2008	05:03	0	0	0
704	08/04/2008	05:04	0	0	0
705	08/04/2008	05:05	0	0	0
706	08/04/2008	05:06	0	0	0
707	08/04/2008	05:07	0	0	0
708	08/04/2008	05:08	0	0	0
709	08/04/2008	05:09	0	0	0
710	08/04/2008	05:10	0	0	0
711	08/04/2008	05:11	0	0	0
712	08/04/2008	05:12	0	0	0
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714	08/04/2008	05:14	0	0	0
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721	08/04/2008	05:21	0	0	0
722	08/04/2008	05:22	0	0	0
723	08/04/2008	05:23	0	0	0
724	08/04/2008	05:24	0	0	0
725	08/04/2008	05:25	0	0	0
726	08/04/2008	05:26	0	0	0
727	08/04/2008	05:27	0	0	0
728	08/04/2008	05:28	0	0	0
729	08/04/2008	05:29	0	0	0
730	08/04/2008	05:30	0	0	0
731	08/04/2008	05:31	0	0	0
732	08/04/2008	05:32	0	0	0
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736	08/04/2008	05:36	0	0	0
737	08/04/2008	05:37	0	0	0
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741	08/04/2008	05:41	0	0	0
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743	08/04/2008	05:43	0	0	0
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745	08/04/2008	05:45	0	0	0
746	08/04/2008	05:46	0	0	0
747	08/04/2008	05:47	0	0	0
748	08/04/2008	05:48	0	0	0

749	08/04/2008	05:49	0	0	0
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752	08/04/2008	05:52	0	0	0
753	08/04/2008	05:53	0	0	0
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755	08/04/2008	05:55	0	0	0
756	08/04/2008	05:56	0	0	0
757	08/04/2008	05:57	0	0	0
758	08/04/2008	05:58	0	0	0
759	08/04/2008	05:59	0	0	0
760	08/04/2008	06:00	0	0	0
761	08/04/2008	06:01	0	0	0
762	08/04/2008	06:02	0	0	0
763	08/04/2008	06:03	0	0	0
764	08/04/2008	06:04	0	0	0
765	08/04/2008	06:05	0	0	0
766	08/04/2008	06:06	0	0	0
767	08/04/2008	06:07	0	0	0
768	08/04/2008	06:08	0	0	0
769	08/04/2008	06:09	0	0	0
770	08/04/2008	06:10	0	0	0
771	08/04/2008	06:11	0	0	0
772	08/04/2008	06:12	0	0	0
773	08/04/2008	06:13	0	0	0
774	08/04/2008	06:14	0	0	0
775	08/04/2008	06:15	0	0	0
776	08/04/2008	06:16	0	0	0
777	08/04/2008	06:17	0	0	0
778	08/04/2008	06:18	0	0	0
779	08/04/2008	06:19	0	0	0
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781	08/04/2008	06:21	0	0	0
782	08/04/2008	06:22	0	0	0
783	08/04/2008	06:23	0	0	0
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785	08/04/2008	06:25	0	0	0
786	08/04/2008	06:26	0	0	0
787	08/04/2008	06:27	0	0	0
788	08/04/2008	06:28	0	0	0
789	08/04/2008	06:29	0	0	0
790	08/04/2008	06:30	0	0	0
791	08/04/2008	06:31	0	0	0

Attachment C

Preliminary Characterization Results

CITY: TAMPA DIV/GRP: 85 DB: JAR LD: 85 AM: PD: TM: TR: LYRON OFF REF
 RYR_2008080305000200010R023805501.dwg LAYOUT: 1 SAVED: 8/21/2008 3:06 PM ACADVER: 17.08 (LMS TECH) PAGES: 17.08 (LMS TECH) PLOTSTYLE: PLT5.ctb PLOTTED: 8/21/2008 3:17 PM BY: RICHARDS, JM
 XREFS: 3803704
 IMAGES: PROJECTNAME:



- LEGEND**
- SITE BOUNDARY
 - ▬ UTILITY TRENCH (SOD COVERED)
 - ▬ UTILITY TRENCH (CONCRETE COVERED)
 - x-x-x- SITE FENCE
 - x-x-x- TREATMENT FACILITY FENCE
 - EW-109 ■ EXTRACTION WELL
 - ⊕ EXISTING UTILITY POLE
 - SP-1 ▲ SAMPLE POINT

REGULATORY LIMITS			
Parameter	Residential Direct Exposure Limit (ug/Kg)	Commercial / Industrial Direct Exposure Limit (ug/Kg)	Leachability Standard Based on GCTL (ug/Kg)
TCE	6,400	9,300	30
PCE	8,800	18,000	30
1,1-DCA	390,000	2,100,000	400
1,1-DCE	95,000	510,000	60
cis-1,2-DCE	33,000	180,000	400
1,4-Dioxane	23,000	38,000	10

SOIL CONCENTRATIONS REPORTED IN MICROGRAMS PER KILOGRAM (µg/Kg)

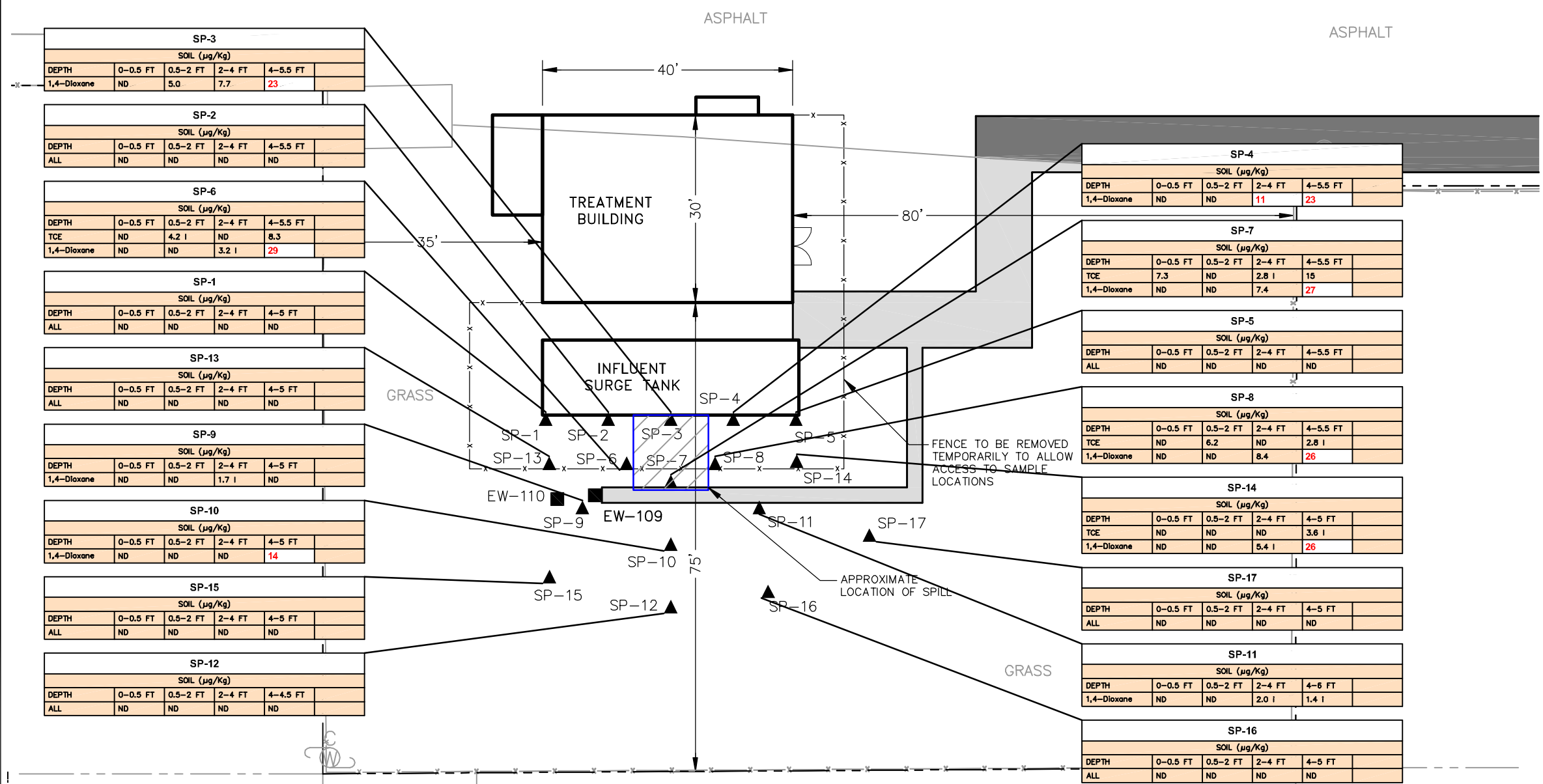
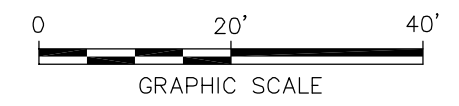
TCE = TRICHLOROETHENE
 PCE = TETRACHLOROETHENE
 1,1-DCA = 1,1-DICHLOROETHANE
 1,1-DCE = 1,1-DICHLOROETHENE
 cis-1,2-DCE = cis-1,2-DICHLOROETHENE

GCTL = GROUNDWATER CLEAN-UP TARGET LEVEL

I = THE REPORTED VALUE IS BETWEEN THE LABORATORY METHOD DETECTION LIMIT (MDL) AND THE LABORATORY PRACTICAL QUANTITATION LIMIT (PQL)

ND = RESULT LESS THAN LABORATORY MDL

SOIL RESULTS ABOVE LEACHABILITY STANDARD BASED ON GCTLs ARE SHOWN AS RED.



SP-3					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5.5 FT	
1,4-Dioxane	ND	5.0	7.7	23	

SP-2					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5.5 FT	
ALL	ND	ND	ND	ND	

SP-6					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5.5 FT	
TCE	ND	4.2 I	ND	8.3	
1,4-Dioxane	ND	ND	3.2 I	29	

SP-1					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5 FT	
ALL	ND	ND	ND	ND	

SP-13					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5 FT	
ALL	ND	ND	ND	ND	

SP-9					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5 FT	
1,4-Dioxane	ND	ND	1.7 I	ND	

SP-10					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5 FT	
1,4-Dioxane	ND	ND	ND	14	

SP-15					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5 FT	
ALL	ND	ND	ND	ND	

SP-12					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-4.5 FT	
ALL	ND	ND	ND	ND	

SP-4					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5.5 FT	
1,4-Dioxane	ND	ND	11	23	

SP-7					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5.5 FT	
TCE	7.3	ND	2.8 I	15	
1,4-Dioxane	ND	ND	7.4	27	

SP-5					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5.5 FT	
ALL	ND	ND	ND	ND	

SP-8					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5.5 FT	
TCE	ND	6.2	ND	2.8 I	
1,4-Dioxane	ND	ND	8.4	26	

SP-14					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5 FT	
TCE	ND	ND	ND	3.6 I	
1,4-Dioxane	ND	ND	5.4 I	26	

SP-17					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5 FT	
ALL	ND	ND	ND	ND	

SP-11					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-6 FT	
1,4-Dioxane	ND	ND	2.0 I	1.4 I	

SP-16					
SOIL (µg/Kg)					
DEPTH	0-0.5 FT	0.5-2 FT	2-4 FT	4-5 FT	
ALL	ND	ND	ND	ND	

FORMER AMERICAN BERYLLIUM COMPANY SITE
TALLEVAST, FLORIDA

SOIL SAMPLING RESULTS



CITY: TAMPA DIMGROUP: 85 DB: JAR LD: 85 AM: PD: TM: TR: LYRON OFF REF*
 RYR_2008080038055000200010R023805504.dwg LAYOUT: 4 SAVED: 8/21/2008 3:18 PM ACADVER: 17.05 (LMS TECH) PAGES: 4 PLOTSTYLETABLE: PLT\FULL.CTB PLOTTED: 8/21/2008 3:18 PM BY: RICHARDS, JIM
 XREFS: 3803704 PROJECTNAME: -

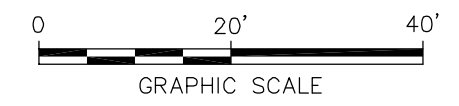


- LEGEND**
- SITE BOUNDARY
 - [Grey Box] UTILITY TRENCH (SOD COVERED)
 - [Dark Grey Box] UTILITY TRENCH (CONCRETE COVERED)
 - x-x-x- SITE FENCE
 - x-x-x- TREATMENT FACILITY FENCE
 - EW-109 ■ EXTRACTION WELL
 - ⊕ EXISTING UTILITY POLE
 - SP-1 ▲ SAMPLE POINT

REGULATORY LIMITS	
Parameter	GCTL (ug/L)
TCE	3
1,4-Dioxane	3.2

GROUNDWATER CONCENTRATIONS REPORTED IN MICROGRAMS PER LITER (µg/L)
 TCE = TRICHLOROETHENE
 GCTL = GROUNDWATER CLEAN-UP TARGET LEVEL
 I = THE REPORTED VALUE IS BETWEEN THE LABORATORY METHOD DETECTION LIMIT (MDL) AND THE LABORATORY PRACTICAL QUANTITATION LIMIT (PQL)
 ND = RESULT LESS THAN LABORATORY MDL
 GROUNDWATER RESULTS ABOVE GCTLs ARE SHOWN AS RED.

- [Pink Line] 1,4 DIOXANE ISOCONTOUR LINE
- [Green Line] TCE ISOCONTOUR LINE (NOT SHOWN ALL RESULTS ND)



FORMER AMERICAN BERYLLIUM COMPANY SITE
 TALLEVAST, FLORIDA
GROUNDWATER SAMPLING RESULTS
10-14 FOOT INTERVAL
TCE AND 1,4-DIOXANE ISOCONTOURS

