



FLORIDA DEPARTMENT OF Environmental Protection

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June 8, 2021

Ms. Amanda Sullivan
ARNG-IED-D PFAS Project Manager
Amanda.D.Sullivan7.ctr@mail.mil

Re: Final Preliminary Assessment Reports for Florida Army National Guard facilities

Dear Ms. Sullivan:

The Department has reviewed the Final Preliminary Assessment Reports for the following Florida Army National Guard facilities: Camp Blanding Joint Training Center, Marianna Readiness Center, Brooksville Readiness Center/Army Aviation Support Facility #2, Cecil Field Army Aviation Support Facility, Dade City Readiness Center, Fort Pierce Readiness Center, Lakeland Readiness Center, Plant City Readiness Center, and Ellyson Field. The Preliminary Assessments were specific to the potential for contamination by per- and polyfluoroalkyl substances (PFAS). The Department has the following observations regarding the reports:

Final Preliminary Assessment Report, Camp Blanding Joint Training Center, Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites, ARNG Installations, Nationwide (October 2018). This Preliminary Assessment Report identified four areas of interest (AOIs) for study in the Site Inspection:

- AOI 1 Skid Strip
- AOI 2 Anderson Bartlett Airfield
- AOI 3 Building 3010
- AOI 4 Wastewater Treatment Plant (WWTP)

The following areas were eliminated from further Camp Blanding Site Inspection work based on no known releases of aqueous film forming foam (AFFF):

- Camp Blanding Airfield
- North Forward Area Refueling Point (FARP)
- Landing Zone (LZ) 125
- Fire Station – Building 2239
- Dining Facility (DFAC)
- Landfills

- LZ 102 (North Bivouac) Area Crash Sites
- LZ 101 Area Crash Site
- LZ 118 Area Crash Site
- Pinner Range Crash Site
- Camp Blanding Airfield Crash Site

Based on the interviews and checklists provided in Appendix B, the areas proposed as AOIs are reasonable as well as those proposed for no action. However, the Department would typically request some sort of sampling around the landfill, fire station, and at least a representative crash site in order to verify the lack of presence of PFAS in the environment corroborating the information collected in the interviews.

Final Preliminary Assessment Report, Brooksville Readiness Center/AASF #2, Spring Hill, Florida, Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites, ARNG Installations, Nationwide (August 2020). The Preliminary Assessment Report identified two AOIs for study in the Site Inspection:

- AOI 1 Wash Rack Area
- AOI 2 AFFF Spill Area

The following areas were eliminated from further Brooksville Readiness Center/AASF #2 Site Inspection work based on no known releases of aqueous film forming foam (AFFF):

- AASF #2 Hangar
- C-23 Hangar

The areas proposed as AOIs appear reasonable based on the type of facility Brooksville Readiness Center/Army Aviation Support Facility #2 is, the documented use and spillage of AFFF, and interviews provided in Appendix B.

Final Preliminary Assessment Report, Army Aviation Support Facility #1, Cecil Field, Jacksonville, Florida, Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites, ARNG Installations, Nationwide (June 2020). The Preliminary Assessment Report identified two AOIs for study in the Site Inspection:

- AOI 1 Former Navy Fire Training Area (Site 7)
- AOI 2 Other Releases (Associated with AFFF dispensing system at Hangar 860)

Please note that the two areas of interest are reversed in Figures 6-1 and 7-1. Also, the Navy is currently conducting PFAS investigations at the Former Naval Air Station Cecil Field. In order for there not to be overlap between the Army National Guard and the Navy investigations, or for this area to be inadvertently omitted, communication should begin and meetings should be

scheduled to determine the path forward. Once the lead responsibility party is determined, the Department should be informed so that coordination on the investigation can continue.

Final Preliminary Assessment Report, Marianna Readiness Center, Marianna, Florida, Perfluorooctane-Sulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) Impacted Sites, ARNG Installations, Nationwide (August 2020). The Preliminary Assessment Report identified one AOI for study in the Site Inspection:

- AOI 1 Well Pump House

The following areas were eliminated from further Marianna Readiness Center Site Inspection work based on no known releases of aqueous film forming foam (AFFF):

- Truck Maintenance Area

Based on the information provided, the Marianna Readiness Center may not be a prime candidate for PFAS contamination. However, because of PFAS impacts to groundwater being extracted from the well associated with the Pump House, it seems reasonable that the Well Pump House receive some level of PFAS investigation.

The **Final Preliminary Assessment Reports for Dade City Readiness Center, Dade City, Florida (August 2020), Ellyson Field, Pensacola, Florida (June 2020), Fort Pierce Readiness Center, Fort Pierce, Florida (August 2020), Lakeland Readiness Center, Lakeland, Florida (August 2020), and Plant City Readiness Center, Plant City, Florida (August 2020)**, did not identify any AOIs and it is stated that these Army National Guard facilities will not move forward in the CERCLA process with regard to PFAS. Based on activities associated with Readiness Centers, the lack of AOIs for PFAS is understandable.

The Department accepts the Final Preliminary Assessment Reports as provided. Please note that if additional information comes to light regarding possible releases of PFAS-containing substances to the environment from areas eliminated from Site Inspection activities, the Department may request that these areas be investigated. If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Waste Cleanup Program

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