



Network Centric Systems  
8333 Bryan Dairy Road  
Largo, FL 33777-1230  
P.O. Box 10037  
Largo, FL 33773-0037  
727.381.2000 voice  
727.343.1295 fax

May 13, 2010

Florida Department of Environmental Protection  
c/o Ms. Deborah Getzoff  
District Director, Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

Re: FDEP Letter, Dated May 13, 2010; Request for Additional Information (RAI)

Dear Ms. Getzoff:

Raytheon Company is concerned and disappointed by the Florida Department of Environmental Protection's (DEP's) decision to issue another Request for Information instead of approving the start of full-scale remediation in the Azalea neighborhood of St. Petersburg.

We want residents to know that Raytheon is eager to begin full-scale remediation. As more fully explained below, Raytheon is certainly willing to answer the DEP's questions, but we do not believe that our dialogue should hold up approval of our proposed Remedial Action Plan.

\* \* \* \*

The Department's latest requests are not about insufficient data: for example, the DEP has asked for a *theoretical* computer modeling effort to be conducted, without citing any regulatory requirement for such modeling, or offering any scientific basis to indicate that this modeling would meaningfully change the proposed approach. Raytheon's scientific consultants do not believe that this modeling is likely to yield additional information necessary for the DEP to approve Raytheon's plan. Moreover, this latest request comes two months after receiving Raytheon's most recent submission, and a full year after Raytheon's original proposal. And regardless of modeling, any remedy will be subject to regular reviews over the course of its operation so that any required adjustments can be made.

Importantly, the DEP's May 14, 2010 letter does not question the appropriateness of the overall approach that Raytheon has proposed. To the contrary, the U.S. EPA letter accompanying the DEP's response emphasizes that Raytheon's proposed choice of remedies "*appears to be highly appropriate*" and that the proposed "*technologies have a proven track record.*" In addition, environmental experts as well as state and local officials have confirmed that these groundwater issues do not pose a threat to public health for the community.

Raytheon and its team of consultants have devoted extraordinary resources toward the preparation and submission of the remediation plan. Raytheon spent a great deal of time consulting with some of the top experts in the field and, based on their recommendations, selected a combination of remedial technologies that are appropriate for aggressive remediation of the site. Under Raytheon's proposal, 97% of contamination mass is gone in 3 years; the majority of the local properties will be cleaned in approximately 10 years, and 90 percent will be cleaned within 20 years. Longer remediation estimates communicated in media reports pertain only to the central portion of the facility site, not the surrounding residential areas.

While Raytheon and its consultants will certainly respond in detail to the DEP's questions, we respectfully urge the DEP to grant provisional approval of at least portions of the Remedial Action Plan beforehand so that work can begin. Indeed, Raytheon intends to begin the necessary preparation of the site so that full-scale remediation can start as soon as possible.

In short, proceeding with remediation will benefit everyone in the community, and Raytheon is eager to begin. In that spirit, we urge the DEP to allow us to do so.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Lee".

Mitchell R. Lee  
Raytheon  
Vice President and Site Executive