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August 30, 2006

Tony Martig
U. S. Environmental Protection Agency
Waste Pesticides and Toxics Division
Region 5
77 W. Jackson Blvd. (DT-8J)
Chicago, IL 60604-3590

RE: Lockheed Martin Akron Airdock
Emergency Removal and Disposal of Exterior Soil beneath Concrete

Dear Mr. Martig:

Lockheed Martin is requesting a risk-based disposal approval from U.S. EPA under 40 CFR 761.61(c).

The approval will be for the disposal of soil, excavated from beneath the concrete apron around the Akron Airdock in the course of maintenance and repair activities, at a state-permitted solid waste disposal facility as waste containing <50 ppm PCBs..

The Akron Airdock facility was discovered in 2003 to contain non-liquid PCBs in the siding. The resulting remediation project has been the subject of a risk-based disposal approval governing the cleaning and disposition of the Airdock contents (June 24, 2004), a Consent Agreement and Final Order (CAFO) governing interim use of the Airdock (May 5, 2005), several formal presentations to U.S. EPA, Lockheed Martin's Airdock Exterior Remediation Plan and Schedule (June 8, 2005), and numerous other submittals to U.S. EPA containing air sampling results and other data. Plans are being developed for additional remediation of the interior of the Airdock. As we have indicated to U.S EPA in these communications, the overall remedial project is expected to take another 2 years or more to complete. The various remedial activities are and will be the subject of separate approval applications.

Meanwhile, the Lockheed Martin Akron plant has an assortment of regular maintenance and repair requirements. Some of these repairs involve removal of portions of the concrete pavement and underlying soil to access buried utilities, such as broken water mains.

Lockheed Martin applied for and received a verbal self-implementing disposal approval from EPA on July 21, 2005 for disposal of the concrete pavement waste from these maintenance and repair projects in a state-licensed non-TSCA landfill. This approval followed collection and analysis of 24 concrete samples, all of which were below 50 ppm PCB, and the highest of which was found to contain 3.3 ppm PCB. The approval included a provision requiring that any cracked pavement be vacuumed first to remove loose particles and debris for disposal as a PCB solid waste.

Following the Airdock fire in May, 2006, assessment of the fire lines supplying that area of the plant determined that some repairs and upgrades were needed, and plans were made to perform related excavation at 11 locations. A sampling program was initiated at each location, including collection of surface soil samples (0-0.25 ft beneath the pavement) and depth samples at 1-2 ft and in some cases 2-4 ft. The results of the sampling program are shown in Table 1. A map of the sample locations is provided in Figure 1, illustrating that the sample distribution represents all paved areas surrounding the Airdock.

From the data, it is apparent that little PCB contamination has penetrated the pavement or worked its way through cracks over the years, and that the sub-pavement soil levels of PCB throughout the area are consistently well below 50 ppm. Only 5 out of 32 sample results were above 1 ppm PCB, and only one sample location had PCB results over 3 ppm PCB.

Lockheed Martin is therefore requesting that EPA grant a risk-based disposal approval allowing any soil waste excavated during maintenance and repair activities underneath pavement around the Airdock to be managed as <50 ppm PCB waste for purposes of disposal, and to be disposed of in a state-permitted landfill. Under this proposal, we ask that any such soil be disposed of without the need for additional sampling beyond the data presented here, that there be no special storage, labeling, or recordkeeping requirements for this material, and that the overall concentration of the concrete waste be assumed to be less than 50 ppm in the aggregate.

If granted, this approval would apply only to soil that is covered with pavement, and only for maintenance and repair projects in the vicinity of the Airdock. In the interim, soil that has not been covered with pavement will, if excavated, continue to be either disposed of as PCB solid waste off-site in a TSCA-permitted landfill, or placed back in the excavation until it is addressed in accordance with the pending overall soil remediation approval.

We look forward to your response. Please contact me at 330-796-8070 (office) or 609-374-0177 (cell) with any questions you may have regarding this application.

Very truly yours,

Brad Heim
Project Manager

Cc: Dave Gunnarson, Lockheed Martin
John Woodyard, Weston Solutions