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Maritime Systems & Sensors
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June 27, 2005

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
Removal and Disposal of Exterior Concrete

Dear Mr. Martig:

Lockheed Martin is requesting a risk-based disposal approval from U.S. EPA under 40 CFR 761.61(c), specifically to dispose of concrete from the apron around the Akron Airdock as non-PCB waste when it is removed for maintenance and repair purposes. Maintenance and repair activities affecting the concrete pavement are frequently necessary now, so we are hoping that this proposal takes priority over other Airdock remedial applications.

Lockheed Martin owns the Akron Airdock facility, which was discovered in 2003 to contain non-liquid PCBs in the siding. A substantial amount of sampling data has been generated to characterize the extent of interior and exterior PCB contamination, and Lockheed Martin has continued internal cleanup work and air monitoring in support of the continued interim use of the Airdock. The Airdock project is known to U.S. EPA; it has been the subject of another risk-based disposal approval governing the cleaning and disposition of the Airdock contents (June 24, 2004), the Consent Agreement and Final Order (CAFO) governing interim use of the Airdock (May 5, 2005), several formal presentations to U.S. EPA, the recent Airdock Exterior Remediation Plan and Schedule (June 8, 2005), and numerous submittals 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 remedial project is expected to take another 2 years or more to complete. The remedial activities will be the subject of separate approval applications.

In the interim, the Lockheed Martin Akron plant is an active manufacturing facility subject to an assortment of regular maintenance and repair requirements. Some of these repairs involve removal of portions of the concrete pavement to access broken water mains buried underneath, after which the concrete is repaired and the concrete waste is disposed.

As part of the PCB contamination assessment, several phases of concrete pavement sampling have been conducted around the Airdock since 2003, all but three using the 1 inch drill core sampling method referenced in the June 24, 2004 approval. Little if any contamination was expected, given that the PCB source is solid particles that are not water-soluble and would not likely penetrate the concrete surface. The results of the first and most extensive round of sampling, which confirmed our expectations, were shared with EPA during our December 2003 presentation. These data showed that all of the results were less than 1 ppm except for one sample (1.9 ppm). Subsequent sampling of the concrete pavement in the vicinity of the Airdock has shown similar results.

All told, 24 exterior concrete samples have been collected spanning the entire concrete apron, with an overall average concentration of 0.49 ppm. Only 3 samples exceeded 1 ppm (1.3, 1.9 and 3.3 ppm). Table 1 contains a listing and analysis of the concrete pavement PCB sample results collected to date. Figure 1 shows an outline of the Airdock and the relative locations of the various exterior concrete samples.

Based on these data, Lockheed Martin is requesting that EPA grant a risk-based disposal approval allowing any exterior concrete waste generated during maintenance and repair activities to be disposed of as non-PCB waste and without restriction. Under this proposal, we ask that any waste exterior concrete be disposed of without the need for additional sampling, that there be no special storage, labeling, transportation, manifesting, notification or recordkeeping requirements for this material, and that the overall concentration of the concrete waste be assumed to be less than 1 ppm in the aggregate. No additional sampling of the underlying soil is proposed.

Recognizing that any dirt or debris on the surface or lodged in concrete cracks may be more contaminated than the concrete, we propose to first remove any loose dirt and debris where encountered and to dispose of the dirt and debris as PCB waste in accordance with 761.61. Our exterior remediation plan, submitted to U.S EPA on June 8, includes a similar provision for vacuuming and disposing of loose material from the concrete pavement as part of the cleanup.

We look forward to your response. Please contact me with any questions you may have regarding this application.

Sincerely,

Brad Heim

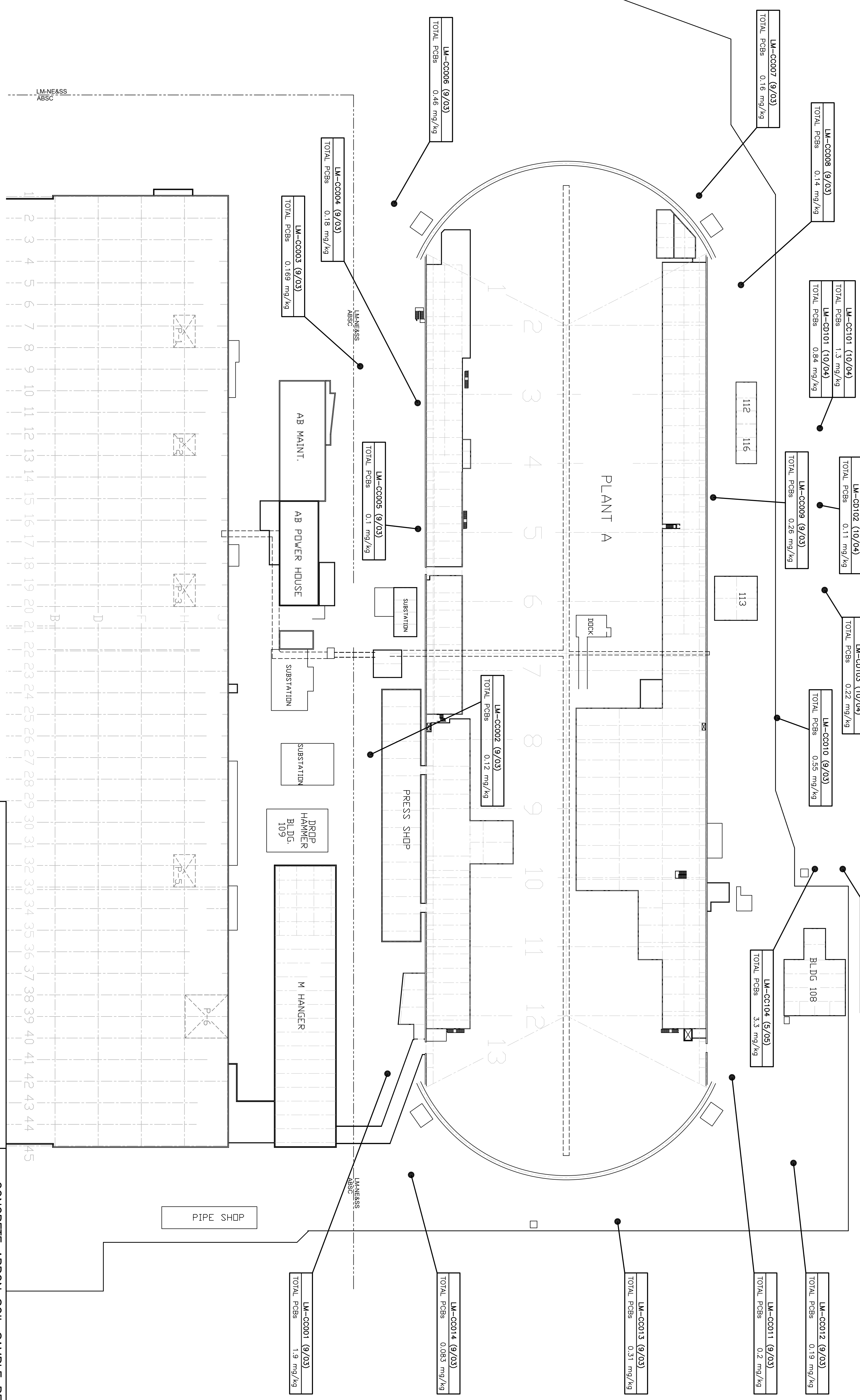
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Enclosures: Table 1 Airdock Exterior Concrete Samples
Figure 1 Airdock Exterior Concrete Samples

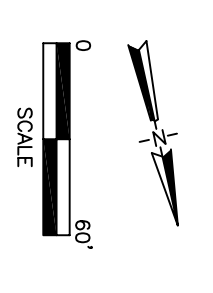
Cc: Dave Gunnarson (Lockheed Martin)
John Woodyard (Weston Solutions)

PLANT E

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LEGEND
● CONCRETE CORE SAMPLING RESULTS



WESTON SOLUTIONS
750 E. Bunker Ct.
Suite 500
Vernon Hills, Illinois
60061

CONCRETE APRON SOIL SAMPLE RESULTS MAP
LOCKHEED MARTIN
Akron, Ohio
SCALE: 1"=60'
DRAWN: D.C.H.
DATE: 1/05
DWG. NO. X
FIGURE 1

Table 1 - Airdock Exterior Concrete Samples

Sample ID	Date	Sta. Code	Matrix	Comment	Result (ppm)
LM-CC001	9/18/2003	Concrete	Core	Exterior concrete sample - NE of building	1.91
LM-CC002	9/18/2003	Concrete	Core	Exterior concrete sample - East of building	0.12
LM-CC002DP	9/18/2003	Concrete	Core	Exterior concrete sample - East of building	0.051
LM-CC003	9/18/2003	Concrete	Core	Exterior concrete sample - East of building	0.169
LM-CC004	9/18/2003	Concrete	Core	Exterior concrete sample - East of building	0.18
LM-CC005	9/18/2003	Concrete	Core	Exterior concrete sample - East of building	0.098
LM-CC006	9/18/2003	Concrete	Core	Exterior concrete sample - SE of building	0.46
LM-CC007	9/18/2003	Concrete	Core	Exterior concrete sample - SW of building	0.16
LM-CC008	9/18/2003	Concrete	Core	Exterior concrete sample - SW of building	0.14
LM-CC009	9/18/2003	Concrete	Core	Exterior concrete sample - W of building	0.26
LM-CC010	9/18/2003	Concrete	Core	Exterior concrete sample - W of building	0.55
LM-CC011	9/18/2003	Concrete	Core	Exterior concrete sample - NW of building	0.22
LM-CC012	9/18/2003	Concrete	Core	Exterior concrete sample - NW of building	0.18
LM-CC013	9/18/2003	Concrete	Core	Exterior concrete sample - North of building	0.31
LM-CC014	9/18/2003	Concrete	Core	Exterior concrete sample - North of building	0.083
LM-CC014DUP	9/18/2003	Concrete	Core	Exterior concrete sample - North of building	0.077
LM-CC101	10/6/2004	Concrete	Core	Concrete Core from Adjacent West Property	1.3
LM-CC102	5/19/2005	Concrete	Core	Concrete Core from Adjacent West Property	0.22
LM-CC103	5/19/2005	Concrete	Core	Concrete Core from Adjacent West Property	0.34
LM-CC104	5/19/2005	Concrete	Core	Concrete Core from Adjacent West Property	3.3
LM-CD101	10/6/2004	Concrete	Debris	Misc. Concrete Debris from Adjacent West Property (chunks of the broken pavement, 1/4"-1 1/2" diameter pieces)	0.84
LM-CD102	10/6/2004	Concrete	Debris	Misc. Concrete Debris from Adjacent West Property (chunks of the broken pavement, 1/4"-1 1/2" diameter pieces)	0.11
LM-CD103	10/6/2004	Concrete	Debris	Misc. Concrete Debris from Adjacent West Property (chunks of the broken pavement, 1/4"-1 1/2" diameter pieces)	0.22
Average Result					0.49