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LOCKHEED MARTIN

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.