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August 28, 2007

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

RE: Application for Risk-Based Soil Cleanup Plan  
Akron Airdock, Akron, Ohio

Dear Mr. Martig:

As presented at our recent meeting held June 26, 2007 regarding the subject site, Lockheed Martin is requesting a risk-based disposal approval from U.S. EPA Region 5 (EPA) under 40 CFR 761.61(c), specifically to cleanup soil from areas outside the Akron Airdock. The attached risk-based application presents sampling results, analysis from a PCB risk assessment, and a proposed soil remediation plan to remove and dispose of approximately 92 cubic yards of soil containing total PCBs over 25 ppm. The application also presents details on a pending environmental covenant to permanently restrict the site to industrial land use.

The conceptual soil cleanup plan was introduced to EPA in the *Akron Airdock PCB Exterior Remediation Strategy* submitted by Lockheed Martin on June 25, 2007. The enclosed risk-based application is supported by data from over 200 soil samples. The risk analysis presented in Section 5 provides support for the conclusion that collectively, the soil remedy, along with other remedial measures undertaken over the past 4 years, is sufficient to protect against unreasonable risk of injury to health or to the environment.

The optimal schedule to implement the proposed soil cleanup is during early fall of this year. Lockheed Martin will initiate the activities described in the application upon approval by EPA.

We look forward to your response. Please contact me if we can provide additional information or if you have any questions regarding this application.

Sincerely,

Brad Heim

Copy: Dave Gunnarson (Lockheed Martin)  
Vanessa Steigerwald Dick (Ohio EPA)  
Chris Burnham (Summit County Port Authority)

Application for  
40 CFR §761.61(c) Risk-Based Cleanup of Soil

Akron Airdock  
Akron, Ohio

August 2007

Lockheed Martin Corporation  
1210 Massillon Road  
Akron, Ohio 44315

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## EXECUTIVE SUMMARY

This risk-based application is for cleanup of polychlorinated biphenyls (PCBs) in soil from areas outside the Akron Airdock (Airdock) facility located in Akron, Ohio. The following approvals are sought under this application addressing soil exposed at the surface and soil beneath pavement:

1. Sampling plan and results for characterization and delineation (completed)
2. Removal and off-site disposal of soil containing PCBs greater than 25 parts per million (ppm) and backfilling with clean (< 1 ppm total PCB) fill (planned)
3. Verification sampling plan following soil removal (planned)

In 2003, the unusual non-liquid PCB Aroclor 1268 was discovered to have been a component of the Airdock's original roof and siding. Exposed soil and soil beneath pavement on and surrounding the Airdock parcel was sampled at over 200 locations (referenced as the "Soil Assessment Area") during several iterative events between 2003 and 2007. The results from the sampling assessments are presented in this application along with a proposed cleanup plan and PCB risk evaluation.

Soil containing PCB concentrations greater than 25 ppm will be removed from two on-parcel areas and covered with clean soil

## 1. INTRODUCTION

Cleanup of the Airdock facility is being conducted pursuant to a CAFO and several risk-based approvals granted by EPA pursuant to 40 C.F.R. §761.61(c). This risk-based application is for cleanup of non-liquid PCBs in soil from areas outside the Airdock facility, located in Akron, Ohio (Figure 1). The following approvals are sought under this application for soil exposed at surface and beneath pavement:

1. Sampling plan and results for characterization and delineation (completed)
2. Removal and off-site disposal of soil containing PCBs greater than 25 parts per million (ppm) and backfilling with clean (< 1 ppm total PCB) fill (planned)
3. Verification sampling plan following soil removal (planned)

This risk-based cleanup application meets the self-implementing requirements of §761.61(a) with the exception that characterization sampling was not conducted in accordance with Subpart N (cleanup site characterization sampling), and verification sampling is not planned in accordance with Subpart O (cleanup verification sampling). Justification for the modified characterization and verification sampling approaches is presented in Sections 3 and 4, respectively.

Lockheed Martin previously requested a risk-based approval for management of soil beneath pavement associated with emergency maintenance and repair activities (August 30, 2006). This application supersedes the August 30, 2006 request.

### 1.1 Background

In 2003, the unusual non-liquid PCB Aroclor 1268 was discovered to have been a component of the Airdock's original roof and siding. PCBs apparently had been included in the coating of the roofing and siding material to serve as a fire retardant. Since the initial PCB discovery and continuing to the present, Lockheed Martin has successfully planned and implemented a voluntary remediation program to manage the Robertson Protected Metal (RPM) roofing and siding material that contains Aroclor 1268.

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Soil Off-Parcel: Based on previously collected data (38 samples; summarized in Section 3.2), the maximum PCB concentration in the off-parcel areas that are subject to this application is 1.7 ppm (a single sample, and the only one over 1 ppm) in any individual soil core sample (exposed or beneath pavement), the average PCB concentration is 0.24 ppm, and the 95 UCL is 0.35 ppm. The calculated risk to workers exposed to off-parcel soil is an excess cancer risk of 4E-07 and a hazard index of 0.031. These data demonstrate that the PCB concentrations in these areas are well below EPA's default unrestricted 7(a)8.2(r) 0[l]-16.1(e)8.2(s)23.7(;)TJ ET Q

### **3. SAMPLING APPROACH AND CHARACTERIZATION DATA**

Sampling of soil as bulk PCB remediation waste was designed to adequately characterize the vertical and horizontal extent of impact, acknowledging the physical features of the site, current and planned occupancy, and the type of release. There is no known date or point of release; rather, the weathering process from the RPM panels is believed to have occurred from non-specific areas of the exposed roof and siding materials and over many years. The PCB that is

### **3.1.1 Southeast Area (Planned Excavation Area)**

Soil core samples were collected from 20 locations based on an approximate 25-foot-center sampling grid in the grassy area located on the eastern side of Airdock south of the electrical substation (Figure 4). This area, referenced as the Southeast Area, contains four, grass-

was conducted in 2005 along transects spaced 100-feet apart that extended outward from the pavement edge onto the airport property and property to the east owned by Aircraft Braking Systems Corporation (ABSC). The sampling distance interval increased away from the site with samples collected just beyond the pavement edge (0 feet), at 25 feet, at 50 feet, and at 100 feet (Figure 3). A focused sampling grid was also conducted in the northwest area between the existing fence and the property line in the northwest corner. In all, a total of 55 soil core samples were collected from on-parcel areas in the North Area. Sampling results from the North Area are summarized in Table 2. Total PCB concentrations in the samples ranges from non-detect to 15 ppm.

The spatial and vertical pattern of PCB impact in the North Area is similar to that in the Southeast Area, with the highest concentrations in the samples closest to the Airdock, and PCB levels sharply declining with depth and distance outward from the source. For example, the sample with the highest PCB concentration, LM-SO057, 15 ppm, was collected in the close

concentrations ranging from 0.0083 to 30 ppm. PCBs were detected at the 1 to 2-foot interval at eight boring locations with concentrations ranging from 0.0073 to 25 ppm. PCBs were detected at the 2 to 4-foot interval at four boring locations with concentrations ranging from 0.0095 to 0.24 ppm. A summary of the analytical data for the soil samples is presented in Table 3.

In general, the data showed no obvious correlation between relative concentration and pavement condition. For example, the highest concentrations of PCBs at the 0 to 0.25-foot and 1 to 2-foot intervals (30 and 25 ppm, respectively) were detected at soil boring location LM-SC8 (this area will be excavated). Pavement condition at LM-SC8 was noted to be poor but without cracks, in contrast to LM-SC9 or LM-SC11, where the pavement was noted to be cracked, but the levels of PCBs were much lower.

## **3.2 SOIL SAMPLING IN OFF-PARCEL AREAS**

Tables 4, 5, and 6 present summaries of soil samples collected from off-parcel areas within the Soil Assessment Area.

### **3.2.1 South Area**

Soil core samples were collected from seven locations in the area known as the South Area (Figure 3). Four samples were collected from the grassy island and three samples were collected from a grass-covered park area in the courtyard between Plants B, C, and G. Sampling results from the South Area are summarized in Table 4.

One sample, LM-SO122, 0-0.5 feet, was reported with a total PCB concentration of 1.7 ppm. Concentrations of the remaining samples, including the deeper sample at LM-SO122, were all less than 1 ppm total PCBs or non-detectable levels.

### **3.2.2 North Area**

Soil core samples were collected from five transects north of the Airdock, three of which were continuations of the on-parcel North Area transects (Figure 3). Soil samples were collected to points approximately 750 feet north of the parcel boundary on to airport property. Eight sample locations are on ABSC property and 17 samples locations are on airport property. Sampling results from the South Area are summarized in Table 5.

All of the samples collected from the off-parcel North Area were reported with either less than 1 ppm total PCBs or non-detectable levels.

### **3.2.3 Subpavement Samples**

## **4. SOIL REMEDIATION PLAN**

The entire 19-acre Airdock parcel will be restricted to industrial land use through a deed notice and environmental covenant as part of the overall site cleanup. Execution of the environmental covenant will be completed by the third quarter of 2008 as required by the grant agreement between Ohio Department of Development, grantor, Summit County Port Authority, site owner and grantee, and Lockheed Martin, development partner.

In addition to the environmental covenant, soil removal will be conducted as a presumptive remedy from certain areas of the Airdock parcel.

Risk analysis of existing sampling data indicates that risk goals will be met following the excavation and removal of soil from two areas: the Southeast Area and the SC-8 Area. Areas of proposed excavation are shown in Figures 4, 5, and 6. The soil remediation plan sets forth guidelines for the proper removal and management of PCB remediation waste with total PCB concentrations above a target cleanup level of 25 ppm. All material removed will be managed and disposed as bulk PCB remediation waste with assumed levels of greater than 50 ppm total PCBs.

### **4.1 SOUTHEAST AREA SOIL EXCAVATION**

Based on the results of characterization sampling completed in the Southeast Area discussed in Section 3.1.1, a narrow strip of unpaved ground near the Airdock contains concentrations of total PCBs in the upper 6 inches of soil ranging from 41 to 460 ppm. One sample location was reported with concentrations of 30 ppm total PCBs at a depth of 2 feet. The planned dimensions



excavation will be conducted around sampling point LM-SC8. All soil and materials beneath the pavement from this area will be managed as TSCA-regulated waste, as if it contains total PCB greater than 50 ppm.

### **4.3 FIELD PROCEDURES**

Plans and specs for the soil removal action will be prepared and used to select contractors prior to initiating work. All work will be conducted in accordance with a site-specific health and safety plan. Facility permits and approvals for subsurface digging will be obtained in accordance with Lockheed Martin safe work practices. The following sections describe the general work elements of the soil removal action.

#### **4.3.1 Excavation**

Each excavation area will be marked in advance and cleared for utilities. Excavation will be performed by either manual or mechanical means. The dimensions and expected removal volumes based upon removal of soil containing levels of PCBs greater than 25 ppm are listed in Table 7. The total volume removed is anticipated to be approximately 92 cubic yards or roughly 138 tons.

#### **4.3.2 Handling and Interim Storage of PCB Remediation Waste**

Any special requirem2(i)-16.1(g)8.2(g)8.2liiree

appropriate TSCA notification of generation of PCB remediation waste will be filed with EPA, as required.

#### **4.4 VERIFICATION SAMPLING AND ANALYSIS**

Following the removal of soil or debris from the excavation area, verification samples will be collected. A diagram showing the proposed sampling areas and excavation area is illustrated on Figure 6.

The Southeast Airdock Soil Excavation Area will be divided into three separate excavation and sampling areas, designated A, B, and C as shown. The SC-8 Area will be designated as excavation and sampling area D. Areas A, B, and C will be further subdivided for verification sampling purposes as A1, A2, A3, B1, B2, C1, and C2.

Each discrete area will be sampled independently for cleanup verification purposes. The following sampling procedures will be conducted:

- Collect three individual samples from the base of each excavation sub-area;
- Use coordinate-based random sampling to select the sampling locations of the three samples from each excavation sub-area;
- Use a core sampler with a diameter 2 cm and 3 cm; and
- Collect samples from the base of the excavation to a maximum depth of 7.5 cm.

cm.



## 5. RISK EVALUATION

Soil PCB data, presented in Section 3, are included in the VAP property-

2007a, 2007b; and Tetra Tech 2004, 2005b, 2006b;). As a result of the two areas of planned excavation, the risk assessment did not consider at least one depth-specific set of analytical results associated with the following seven sampling locations LM-S0005, LM-S0007, LM-S0009, LM-S0045, LM-S0048, LM-S0051, and LM-SC8.

### 5.2.1 Exposure Setting and Pathways

Receptors are expected to be exposed to PCBs in soil beneath and near the Airdock through a variety of exposure settings and pathways. The potentially complete exposure pathways considered in this PCB risk evaluation include the following: incidental ingestion of, direct contact with, and inhalation of fugitive dusts from surface soil (Note: industrial workers are expected to be exposed to surface soil only outside the Airdock, on- - residential receptors are expected to be exposed to surface soil only at off-

### 5.2.2 Exposure Quantification

Standard risk assessment procedures were followed in accordance with EPA (for example EPA 1989, 1996, 1997, 2003, and 2004a) and Ohio EPA (2002) . Receptor- and pathway

The 95 UCL values calculated for on- and off-parcel surface soil are presented in Tables A-1 and A-2, respectively in Appendix A. The on- and off-parcel surface soil EPCs were set equal to the 95 UCLs, 1.8 and 0.34 mg/kg, respectively.

**5.2.3 Receptor-Specific Exposures**      **BT**      **0 Tc 0kr9**      **q**      **Tc 0 Tw7/F1 1rce3re a**



risk and hazard characterization.



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## TABLES

TABLE 1

**ON-PARCEL SOIL SAMPLES COLLECTED FROM SOUTHEAST AREA  
AKRON AIRDOCK - AKRON, OHIO**

Sample ID No.	Depth (feet)	Date	1016	1221	1232	1242	1248	1254	1260	1268	Total PCBs (mg/kg)
<b>Samples Above 25 ppm</b>											
LM-SO005	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	290	290
LM-SO007	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	460	460
LM-SO009	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	130	130
LM-SO045-006	0-0.5	6/7/2004	ND	ND	ND	ND	ND	ND	ND	50	50
LM-SO045-012	0.5-1	6/7/2004	ND	ND	ND	ND	ND	ND	ND	12	12
LM-SO045-024	1-2	6/7/2004	ND	ND	ND	ND	ND	ND	ND	33	33
LM-SO045-24 DUP	1-2	6/7/2004	ND	ND	ND	ND	ND	ND	ND	30	30
LM-SO048-006	0-0.5	6/7/2004	ND	ND	ND	ND	ND	ND	ND	41	41
LM-SO051-006	0-0.5	6/7/2004	ND	ND	ND	ND	ND	ND	ND	150	150
<b>Remaining Samples (&lt;25 ppm)</b>											
LM-SO004	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	<b>3.1</b>	<b>3.1</b>
LM-SO004 DUP	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	<b>2.9</b>	<b>2.9</b>
LM-SO006	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	<b>13</b>	<b>13</b>
LM-SO008	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	<b>13</b>	<b>13</b>
LM-SO010	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	<b>0.75</b>	<b>0.75</b>
LM-SO011	0-0.5	9/17/2003	ND	ND	ND	ND	ND	ND	ND	<b>9</b>	<b>9</b>
LM-SO043-006	0-0.5	6/7/2004	ND	ND	ND	ND	ND	ND	ND	<b>2.3</b>	<b>2.3</b>
LM-SO043-012	0.5-1	6/7/2004	ND	ND	ND	ND	ND	ND	ND	<b>0.39</b>	<b>0.39</b>
LM-SO043-024	1-2	6/7/2004	ND	ND	ND	ND	ND	ND	ND	<b>0.11</b>	<b>0.11</b>
LM-SO044-006	0-0.5	6/7/2004	ND	ND	ND	ND	ND	ND	ND	<b>0.37</b>	<b>0.37</b>
LM-SO044-012	0.5-1	6/7/2004	ND	ND	ND	ND	ND	ND	ND	<b>0.24</b>	<b>0.24</b>
LM-SO044-024	1-2	6/7/2004	ND	ND	ND	ND	ND	ND	ND	ND	ND
LM-SO046-006	0-0.5	6/7/2004	ND	ND	ND	ND	ND	ND	ND	<b>3.8</b>	<b>3.8</b>
LM-SO046-012	0.5-1	6/7/2004	ND	ND	ND	ND	ND	ND	ND	<b>0.054</b>	<b>0.054</b>
LM-SO046-024	1-2	6/7/2004	ND	ND	ND	ND	ND	ND	ND	<b>0.018</b>	<b>0.018</b>

See notes at end of Table





Sample ID No.	Depth (feet)	Date	1016	1221	1232	1242	1248	1254	1260	1268	Total PCBs
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Sample ID No.	Depth (feet)	Date	1016	1221	1232	1242	1248	1254	1260	1268	Total PCBs (mg/kg)	
LM-SO115	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	0.6 J	0.6 J	
LM-SO116	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	0.69 J	0.69 J	
LM-SO117	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	1.5 J	1.5 J	
LM-SO117	0.5 - 1	5/25/2005	ND	ND	ND	ND	ND	ND	ND	0.25 J	0.25 J	
LM-SO118	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	4.8 J	4.8 J	
LM-SO118	0.5 - 1	5/25/2005	ND	ND	ND	ND	ND	ND	ND	0.2 J	0.2 J	
LM-SO119	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	0.13 J	0.47 J	0.6 J	
LM-SO120	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	0.14	0.1	0.24	
LM-SO120DUP	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	0.17	0.11	0.28	
LM-SO121	0 - 0.5	<del>5/25/2005</del>	ND	ND	ND	ND	ND	ND	ND	1.2 J	0.94 J	2.14 J
LM-SO121	0.5 - 1	<del>5/25/2005</del>	NDND	ND	ND	ND	ND	0.14	ND	0.037	0.177	







TABLE 4

OFF-PARCEL SAMPLES COLLECTED FROM SOUTH AREA  
AKRON AIRDOCK - AKRON, OHIO

Sample ID No.	Depth (feet)	Date Sampled	1016	1221	1232	1242	1248	1254	1260	1268	Total PCBs (mg/kg)
LM-SO122	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	1.7 J	1.7 J
LM-SO122	0.5 - 1	5/25/2005	ND	ND	ND	ND	ND	0.13	ND	0.11	0.24
LM-SO123	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	0.082 J	0.2 J	0.282 J
LM-SO124	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	0.051	0.083	0.134
LM-SO125	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	0.076	0.084	0.16
LM-SO126	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND
LM-SO127	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND
LM-SO128	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	0.044	0.044

Notes:

PCBs = Polychlorinated biphenyls

mg/kg = Milligrams per kilogram

J = Estimated concentration, quantified below the reporting limit.

ND = Not detected

TABLE 5

**OFF-PARCEL SOIL SAMPLES COLLECTED FROM NORTH AREA  
AKRON AIRDOCK - AKRON, OHIO**

Sample ID No.	Depth (feet)	Date Sampled	1016	1221	1232	1242	1248	1254	1260	1268	Total PCBs (mg/kg)
LM-SO60	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	0.14 J	0.51 J	0.65 J
LM-SO61	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	ND	0.29 J	0.29 J
LM-SO62	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	ND	0.39 J	0.39 J
LM-SO63	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	ND	0.22 J	0.22 J
LM-SO64	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	0.3 J	0.57 J	0.87 J
LM-SO65	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	ND	0.3 J	0.41 J
LM-SO65 DUP	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	ND	0.27 J	0.27 J
LM-SO66	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	ND	0.49 J	0.49 J
LM-SO67	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	0.38 J	0.36 J	0.74 J
LM-SO68	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	ND	0.24 J	0.24 J
LM-SO69	0 - 0.5	5/23/2005	ND	ND	ND	ND	ND	ND	ND	0.085	0.085
LM-SO69A	0 - 0.25	11/9/2005	ND	ND	ND	ND	ND	ND	ND	0.094	0.094
LM-SO70	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.059	0.059
LM-SO70A	0 - 0.25	11/9/2005	ND	ND	ND	ND	ND	ND	ND	0.083	0.083
LM-SO71	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.037	0.037
LM-SO84	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.12	0.12
LM-SO85	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.087	0.087
LM-SO86	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND
LM-SO86 DUP	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND
LM-SO87	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND
LM-SO100	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.022	0.022
LM-SO101	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.035	0.035
LM-SO102	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.028	0.028
LM-SO103	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.03	0.03
LM-SO104	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.045	0.045
LM-SO105	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.022	0.022
LM-SO105 DUP	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND
LM-SO106	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	0.064	0.064
LM-SO110	0 - 0.5	5/24/2005	ND	ND	ND	ND	ND	ND	ND	0.07	0.25
LM-SO114	0 - 0.5	5/25/2005	ND	ND	ND	ND	ND	ND	ND	0.25 J	0.25 J

## Notes:

PCBs = Polychlorinated biphenyls

mg/kg = Milligrams per kilogram

J = Estimated concentration, quantified below the reporting limit.

ND = Not detected

DUP = Duplicate sample

**TABLE 6**

**OFF-PARCEL SOIL SAMPLES COLLECTED BENEATH PAVEMENT  
AKRON AIRDOCK - AKRON, OHIO**

<b>Sample ID No.</b>	<b>Depth (feet)</b>	<b>Date Sampled</b>	<b>1016</b>	<b>1221</b>	<b>1232</b>	<b>1242</b>	<b>1248</b>	<b>1254</b>	<b>1260</b>	<b>1268</b>	<b>Total PCBs (mg/kg)</b>
LMC-SC105	0-0.25	5/10/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND
LMC-SC106	0-0.25	5/10/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND
LMC-SC107	0-0.25	5/10/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND
LMC-SC108	0-0.25	5/10/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND

Notes:

ND = Not detected

mg/kg = Milligrams per kilogram

Cleanup Area	Sub-Area	Length (feet)	Width (feet)	Depth (feet)	Volume (cubic yards)
	<b>A</b>				<b>30.90</b>
	A-a	70	22.5	0.5	29.17
	A-b	5	10	0.5	0.93
	A-c	3.5	12.5	0.5	0.81
	<b>B</b>				<b>22.25</b>
	B-a				

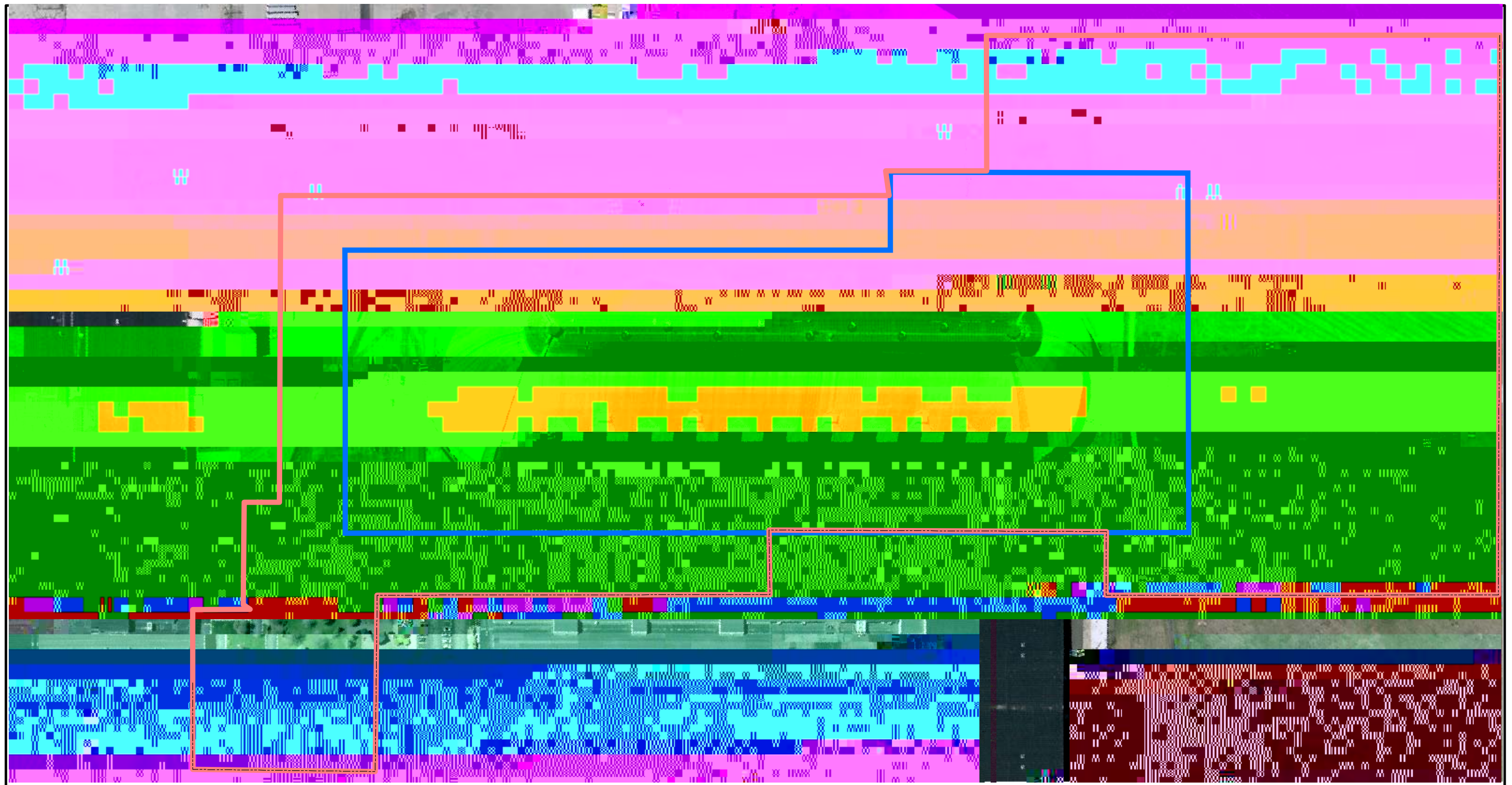


## **FIGURES**



**(6 pages)**







**LEGEND**

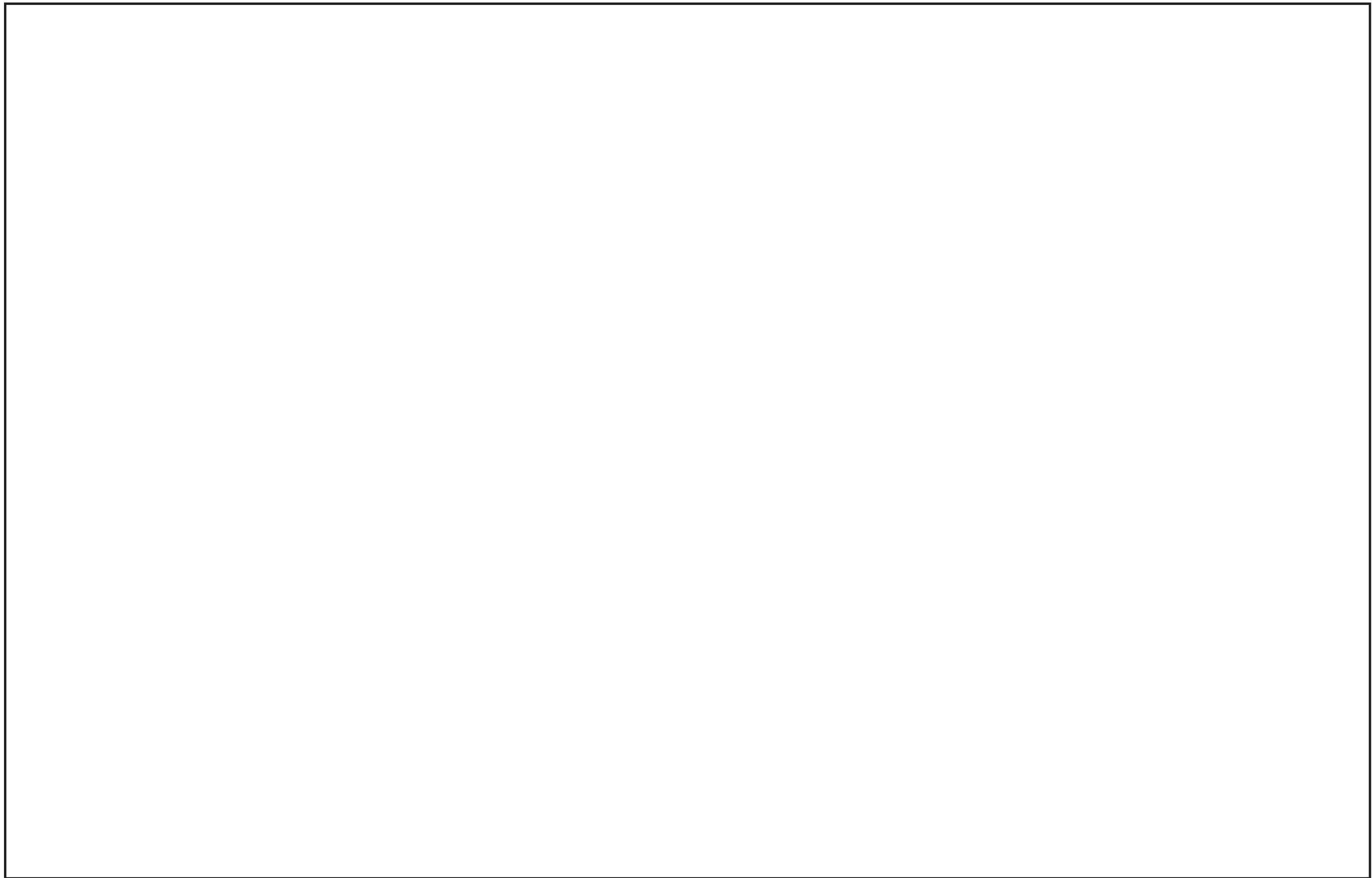
-  Soil Assessment Area Boundary
-  Approximate Airdock Boundary



- LEGEND**
- ! On-Parcel Surface Soil Sample
  - ! On-Parcel Sub-Pavement Soil Sample
  - ! Off-Parcel Surface Soil Sample
  - ! Off-Parcel Sub-Pavement Soil Sample
  - Approximate Airdock Boundary

LEGEND





## **APPENDIX A**

### **SOIL STATISTICS FOR ON--**

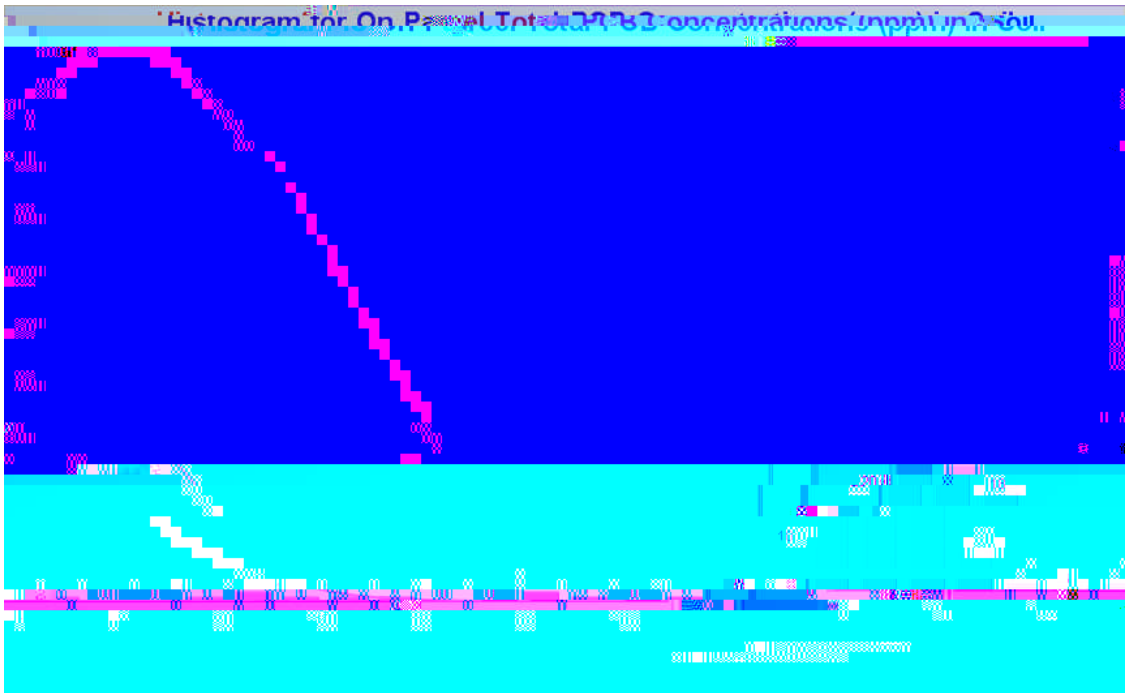




TABLE A-

**TABLE A-2**

**EXPOSURE POINT CONCENTRATION CALCULATIONS  
POLYCHLORINATED BIPHENYLS IN SOIL -- OFF-PARCEL  
PROPERTY-SPECIFIC RISK ASSESSMENT  
AKRON AIRDOCK  
AKRON, OHIO**

**Raw Statistics**

**Normal Distribution Test**