UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL
CLEANUP

July 20, 2012

Mr. Brad Owens
Director Environmental Remediation
Lockheed Martin Corporation
6801 Rockledge Drive
Bethesda, Maryland 20817

Re: **Need for Immediate Action** at Lockheed Martin Company (LMC)/Martin Marietta Corporation Superfund Site, The Dalles, Oregon

Dear Mr. Owens:

The U.S. Environmental Protection Agency, Region 10, has immediate concerns with potential threats to human health and the environment at the Lockheed Martin Company-owned site, also known as the Martin Marietta Reduction Facility Superfund Site, located in The Dalles, Oregon. The EPA is concerned that toxic and explosive gases at the Site have been reported approaching or exceeding levels deemed immediately dangerous to life or health (IDLH) and/or the lower explosive limit (LEL).

On or about July 6 to July 9, 2012, LMC-authorized representatives conducted a preliminary "screening" at the Site without an EPA-approved sampling and analysis plan. The "screening" results shared with EPA strongly suggest that the EPA's concerns with IDLH and LEL levels detected in 2004 and 2005 at the Site are valid and that a full and complete characterization of air/gas is appropriate. As we discussed on July 10, 2012, a Sampling and Analysis Plan is due to the EPA on July 25, 2012. The Sampling and Analysis Plan must be accompanied by a health and safety plan (HSP 1).

Based on the requirements of the CERCLA Consent Decree (Civil Action Number 89-714-MA) and air monitoring data reviewed to date, LMC must take action immediately to secure the Site so that access for activities other than for full characterization of air/gas are limited until characterization is completed and any immediate threats that are identified are addressed. Other than for purposes of sampling and analyzing air/gas at the Site owned by LMC, no person should be allowed access to the Site at this time until the results of air/gas sampling at the Site pursuant to an EPA-approved Sampling and Analysis Plan and EPA-reviewed HSP for that Plan have been received, reviewed, and evaluated and necessary engineering and/or institutional controls are in place. All landfills, waste piles, scrubber sludge ponds, sumps, tanks, ancillary tank equipment, drainages, vents, leachate collection systems/drainages and all associated ancillary equipment owned and/or operated and/or remediated by LMC and/or Arcadis at the Site must be secured so as to prevent access by any person. Before LMC takes immediate action to secure the Site, LMC must ensure that an EPA-reviewed Health and Safety Plan (HSP 2) is in place before any LMC employee, agent, authorized representative or contractor accesses the Site owned/operated/remediated by LMC and/or Arcadis to inspect and secure the Site. Fencing and signage must be installed to secure access to the 300,000-gallon CERCLA tank if there is no fencing in place at this time.

EPA is aware of one utility company with an easement in proximity to the CERCLA landfill. LMC must ensure that this utility company is informed in writing of EPA's concerns with current access to the Site and, to the extent this utility company must access the Site at this time for critical utility work, LMC must have the HSP 2 in place for such access and a LMC employee/agent/contractor certified and trained to work at hazardous environmental sites must accompany such utility company workers/employees on and off the Site.

The EPA is also concerned that the Site is located in an area that might be subject to wildfire. LMC must immediately update its contingency plan for the Site to address a fire scenario and submit the updated plan to EPA and DEQ for review and approval by no later than July 30, 2012. The update must include written notices to local firefighting resources of EPA concerns with the presence of explosive and toxic gases at the Site at this time and protective measures that should be taken in the event of a fire at the Site. In addition, we recommend that you notify adjacent land owners of the potential risks.

Thank you for your prompt attention to this matter. If you have any questions, please contact me at 509-376-8631 or faulk.dennis @epa.gov or Harry Craig of my staff at 503-326-3689 or craig.harry@epa.gov.

Sincerely,

Dennis Faulk, Program Manager
Hanford Project Office

cc: C. Douglas Goins, Assoc. General Counsel, LMC
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