

STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION
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January 17, 1984

Mr. Richard Mico
Sparton Technology, Inc.
P.O. Box 1784
Albuquerque, NM 87103

Send to	Richard Mico	
Street and No.	P.O. Box 1784	
P.O., State and ZIP Code	Albug. NM	
Postage		\$

RE: Requirements for Sparton to comply with regulations administered by the Ground Water and Hazardous Waste Bureau

Dear Mr. Mico:

This letter addresses certain responsibilities of Sparton Technology, Inc. under the New Mexico Water Quality Control Commission (NMWQCC) Regulations Part 3 and the New Mexico Hazardous Waste Management (NMHWM) Regulations. Also discussed are the results of recent ground water sampling by Environmental Improvement Division (EID) personnel. Please note that, as detailed below, response is required before January 25, 1984.

Preliminary results of analyses of ground-water samples obtained from monitor wells at Sparton Technology's facility on Coors Road collected by the EID during the December 1 and 2, 1983 EID visit, indicate substantial organic contamination on site. Trichloroethene (TCE) was found in samples from monitor wells 1, 2, 4, 5, 6, 9, 11 in concentrations that exceeded the New Mexico Water Quality Control Commission (NMWQCC) numerical ground water standard (.1 mg/l). The remaining monitor wells also showed significant levels of TCE, although the NMWQCC standards were not exceeded.

On December 19, 1983, the EID sampled 4 wells within an approximate 1 mile radius of the Sparton site to gather data about potential immediate health hazards. The Black's well, located at their residence, just north of the airport was the only well that exhibited organic contamination (Tetrachloroethene), although concentrations did not exceed NMWQCC numerical standards and therefore are not considered to constitute a immediate health hazard. Other wells sampled included the Black's stock well, immediately southeast of Sparton at the bottom of the alluvial terrace, the Briscoe well, east of Sparton on Coors Road and the Paradise Valley Trailer Park well to the south of Sparton.

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Several conclusions can be drawn from these well sampling results:

1. Some organic contamination may be present in background water quality at the Sparton site, although the background contamination is somewhat different from on-site contamination in regards to the relative proportions of TCE and Tetrachloroethene levels.
2. Sparton's activities have greatly contributed to organic contamination, causing the NMWQCC numerical standards to be exceeded over most of their property and probably beyond their property.
3. No present immediate health hazard has been documented from the organic ground-water contamination at the Sparton site. However, continued migration may contaminate existing wells causing a health hazard in a matter of years, or an immediate hazard may become evident sooner if a water supply well is drilled within the as yet undefined plume.

To obtain discharge plan approval and comply with the NMWQCC Regulations, Sparton must address or commit to the following items or activities in writing, respectively:

1. Cease discharging to the two plating lagoons. The continued use of these lagoons may be contributing to existing levels of contamination in ground water below the site. The discharge plan states that these lagoons are no longer in use. However, during a site visit by the EID on December 12, 1983, plating wastes were evident in the lagoons.
2. Continued leaching of organic contaminants and plating wastes from the vadose zone constitute a source of discharge under the NMWQCC Regulations. This source of contamination has continued after adoption of Part 3 of the Water Quality Control Commission Regulations became effective in February, 1977, and after Sparton was notified by letter dated May 20, 1983, that a discharge plan was required for the facility. At least part of the presently existing ground water contamination entered ground water after these dates. In addition, since Sparton's closure plans provide for only limited removal of vadose zone contamination, the remaining unreclaimed part of the vadose zone may still leach to ground water. As part of its discharge plan Sparton should commit to the implementation of and provide a schedule for aquifer reclamation to address this contamination. Of primary interest, is the area of gross contamination directly below the lagoons. The method of reclamation and eventual fate of the reclamation waste stream must be addressed.
3. Propose key parameters, monitoring schedule, monitoring wells and reporting frequency for continued monitoring of the migration of existing organic and inorganic contamination and for the assessment of the performance of aquifer reclamation.

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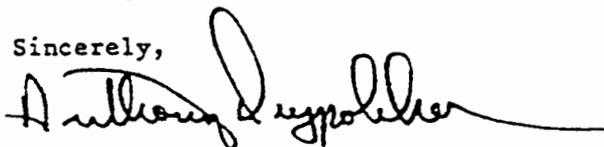
Please be advised that pursuant to Section 3-106.A. of the NMWQCC Regulations Sparton must have an approved discharge plan, or EID permission to continue temporarily without an approved plan, by January 25, 1984. Sparton should submit the appropriate responses to the aforementioned requests promptly.

Due to the serious extent and hazards posed by the contamination at the Sparton site, the EID has suggested to EPA that Sparton Technology be entered on the Emergency and Remedial Response Inventory System (ERRIS), a national hazardous waste tracking system. Thus, Sparton will eventually be assessed by a federal inspection team. Any remedial action you commit to under the discharge plan and then carry out will be brought to the attention of EPA for their consideration in evaluating the Sparton facility.

In satisfying the requirements of the NMWQCC Regulations and/or any other requirement which may be deemed necessary to alleviate problems currently in existence at the facility, Sparton should be aware that it may also be subject to other obligations under the New Mexico Hazardous Waste Management Regulations (HWMR). Specifically, Sparton must consider the following items:

1. EIB/HWMR-1, Section 302.C3.c.(2) provides that changes in processes for treatment, storage, or disposal of hazardous waste at a facility may be approved by the director if the owner or operator submits a revised Part A permit application and the change is necessary to comply with state regulations.
2. The approval of any closure plan concerning the existing surface impoundments will not be addressed until the requirements of Section 206.C.1. have been met.
3. The completion of any remedial action taken pursuant to the NMWQCC Regulations does not relieve Sparton of any future responsibilities for further remedial actions under the New Mexico Hazardous Waste Management Regulations.

Sincerely,



Anthony Drypolcher
Acting Bureau Chief
Ground Water and Hazardous Waste Bureau

AD:KB and MSG:egr

cc: Richard Mitzelfelt, EID District I, Manager
Thomas Burger, Harding and Lawson
Maxine S. Goad, EID, Ground Water Section
Raymond Sisneros, EID, Hazardous Waste Section

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