

ENVIRONMENTAL IMPROVEMENT DIVISION
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DENISE FORT, DIRECTOR

MEMORANDUM

TO: Anthony F. Drypolcher, Chief, Ground Water/Hazardous Waste
THRU: Peter H. Pache, Program Manager, Hazardous Waste Section
FROM: Ann Claassen, Water Resource Specialist II, Hazardous Waste Section
DATE: 2 November 1984
RE: Sparton Technologies, Inc.; Communication Issues

This memo responds to issues raised by Kent Bostick's 11/2/84 memo to you.

1. Regarding our "unwillingness" to meet with Sparton: Sparton requested a meeting to argue the question of whether they should analyze for EP-toxicity versus total metals in their soil samples. No amount of discussion on this point could affect the regulatory mandate. Because the meeting would have taken up the time of a number of staff without any possibility of changing the analytical requirements to be imposed on Sparton, we refused to have a meeting on this particular subject. The decision to not meet was made after extensive phone conversations with Sparton, and with EPA, to verify that the point was not debatable.
2. Regarding whether we are talking to Sparton: We have been in frequent communication with Sparton over the past few months: we met with them in May; I visited the facility in June and talked extensively with Tom Burger and Terry Boone at that time; I visited again in late August with Kevin Lambert. Tom Burger has often called me regarding events at Sparton. Kevin Lambert, Joel Hubbell and I have also keep each other well informed of any communication with Sparton.

We have not initiated communication with Sparton for the past few weeks, because there has been no need to do so. Sparton is to date in compliance with the Hazardous Waste ground water requirements. Regarding the other issue Hazardous Waste has with Sparton -- soil contaminant clean-up -- the ball is in Sparton's court; we were under the impression that they were going to send us results of soil cores taken in September.

We had not yet called Sparton regarding future ground water requirements, because we were still researching the extent of our authority under the

Reauthorization. We would have preferred that Kent delay his call until we had more opportunity to clarify our position and to discuss it with him.

3. Regarding communication between the Sections: We are disappointed that Kent called Sparton without letting Hazardous Waste know that he intended to do so. We had thought this was to be a mutual call, as per your directive. By calling Sparton on his own, Kent could only have heightened any impression that we weren't talking to Sparton.

We are disappointed that Kent did not afterwards discuss the call with us. The memo to you was the first knowledge we had on the content of the call.

We are disappointed to learn that Kent and other members of this Bureau have been meeting about the off-site drilling at Sparton without informing Hazardous Waste or inviting our input, even though the request for drilling was ours and the enforcement of off-site clean-up will be under our regs. We hope to be included in all future discussions so that our perspective will be properly represented, and so that we will not misrepresent other Sections when we talk to Sparton. (As stated above, Kevin, Joel and I had been in good communication up to this time.)

It is ironic that Kent complained to you about our lack of communication with Sparton, when he has communicated so poorly with us. This is contrary to the spirit of cooperation you have requested for the Bureau, and which this Section is anxious to promote. We hope the situation will be remedied in the near future.

xc: Kent Bostick, Technical and Enforcement Section
Kevin Lambert, Ground Water Section
Dennis McQuillan, Ground Water Surveillance Section