



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

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DALLAS, TEXAS 75202

Spartan - Dine

August 31, 1989

Mr. Boyd Hamilton
Program Manager Hazardous Waste Program
Environmental Improvement Division
New Mexico Health and Environment Department
P.O. Box 968
Santa Fe, New Mexico 87504-0968



RE: Comprehensive Ground Water Monitoring Evaluation (CME)
Spartan Technology, Inc.
EPA ID No. NMD083212332

Dear Mr. Hamilton: *pit*

On July 17-19, 1989, personnel of the U.S. Environmental Protection Agency (EPA), Region 6, conducted an oversight evaluation of the New Mexico Environmental Improvement Division (NMEID) CME inspection at Spartan Technology, Inc., located in Albuquerque, New Mexico. Suzanne Moore-Mayne of NMEID conducted the CME inspection in a highly professional manner that was completely satisfactory in all respects.

No regulatory violations were noted by EPA or NMEID during the CME inspection; however, fifteen (15) technical deficiencies were noted by the EPA and NMEID inspectors during the exit interview. These technical deficiencies are as follows:

- 1) order of sample collection should be from most volatile to least volatile parameters;
- 2) bladder pump rate should be reduced to a rate of ground water flow of less than 100 milliliters/minute (ml/min.) during sample collection;
- 3) check well depth annually or each time pump is pulled;
- 4) calibrate the air line readings against other quantitative measurements on an annual basis;
- 5) the air line gauge should contain intervals of at least 1 pound/square inch (psi) for more accurate gauge readings of the air line;
- 6) collect pH, specific conductance and temperature readings;
- 7) rinse outside of sample bottles and contain the rinsewater;

- 8) sampling personnel should wear protective coats for splash protection;
- 9) plastic sheeting should be spread around the wellhead to contain splashes and place equipment on, etc.;
- 10) the facility's log book needs more detailed reporting of the sampling event;
- 11) duplicate samples should be collected for laboratory quality control;
- 12) repair the crimped air line on MW-21;
- 13) report the first four readings, convert the readings into feet (to within .01 foot) and average the last three footages to obtain depth to water;
- 14) measure turbidity of the samples; and
- 15) the VOA bottles provided by the laboratory for field blanks contained air bubbles.

Enclosed is a copy of the EPA oversight evaluation report. For this inspection, EPA chose to decline splitting samples with NMEID. Once the CME report is completed for NMEID and transmitted to EPA, the CME report will be reviewed by EPA and comments about the report will be sent to NMEID. The CME photographs taken by EPA will be transmitted to NMEID under separate cover. Should you have any questions, please feel free to contact me or have your staff contact Bobby Williams of my staff at (214) 655-6480.

Sincerely,



Randall E. Brown
Chief
RCRA Enforcement Branch (6H-C)

Enclosure

**OVERSIGHT EVALUATION CHECKLIST
RCRA COMPREHENSIVE GROUND WATER MONITORING EVALUATION**

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 6, DALLAS, TEXAS**

EPA I.D. No. NMD083212332

Name of Facility Sparton Technology, Inc.

Location 9621 Coors Road, N.W.

Albuquerque, New Mexico

Type of Facility: Electronics Manufacturing Plant

Date of Inspection: July 17-19, 1989

Inspection Participants:

*Name	Agency/Company/Position	Telephone
Bobby Williams	U.S. EPA - Region 6 - Geologist	214/655-6480
Suzanne Moore-Mayne	NMEID - Geologist	505/827-0170
Julie Wanslow	" "	"
Pat Durkin	Sparton - Main Mgr.	505/892-5300
Ven Samala	Sparton - Envir./Safety Engr.	"
Robert Boldonado	Sparton - Chemical Handler	"
Pete Metzner	Metric Corp. - Project Mgr.	505/828-2801
Gary Richardson	" " - Project Engineer	"

(Check One)

Federal: _____

Commercial TSD: _____

Other: Private

Prepared by: *Bobby Williams* Bobby Williams Date: August 29, 1989

Concurred by: Guy Tidmore Date: August 29, 1989

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 EPA Sample Results and Sample Plan

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INSPECTION SUMMARY

General Comments:

A Comprehensive Ground Water Monitoring Evaluation (CME) was conducted July 17-19, 1989, at Sparton Technology, Inc. in Albuquerque, New Mexico. New Mexico Environmental Improvement Division (NMEID) was the lead agency conducting the CME. Staff from EPA, Region 6 participated in the CME strictly in an oversight capacity.

Sparton Technology, an electronics manufacturing and assembly company, commenced operations at 9621 Coors Road, N.W., during 1961. The facility consists of a 64,000 square foot building located on approximately 12 acres west of the Rio Grande. The building houses engineering and drafting support, machine and model shops, printed circuit board manufacturing and assembly areas, and testing laboratories.

RCRA units requiring ground water monitoring at Sparton include the east pond and west pond which are located north of the plant building. A pre-RCRA solvent sump is located near the ponds. All of these units are presently closed and have an asphalt cap covering them.

The site is underlain by unconsolidated deposits of Santa Fe group and alluvium comprised of interbedded sand, gravel, silt and clay. Depth to the uppermost saturated zone is approximately 65 feet below the surface. The flow direction of the uppermost saturated zone is to the south-southwest. An aquitard consisting of clayey-silt to silty clay separates the upper saturated zone from the lower flow zone. The aquitard ranges in thickness from 0.3 feet in the southwest corner of the property to approximately 13 feet under the closed ponds. The lower flow zone direction is to the southwest.

The uppermost saturated zone and the lower flow zone are known to be contaminated with solvents and chromium. Ground water from the uppermost saturated zone is presently being recovered and sent through an air-stripper prior to use by the facility. After the water is used by the facility, it is discharged into the Albuquerque waste water sewer system. The lower flow zone is presently under assessment for the extent of contamination.

The CME inspection conducted during July 17-19, 1989, was the first CME inspection of Sparton Technology, Inc.. The following deficiencies were identified by the State inspectors during this CME.

Regulatory Deficiencies:

None.

Technical Deficiencies:

- 1) Order of sample collection should be from the most volatile ground water parameter to the least volatile parameter;

- 2) The discharge rate of the bladder pumps should be reduced to less than 100 ml/min. while collecting samples;
- 3) Check depth of well annually or each time the pump is pulled for repair, whichever is more frequent;
- 4) Calibrate the air line readings against other quantitative measurements on an annual basis to check accuracy;
- 5) The air line gauge should contain interval increments of at least 1 psi for more accurate gauge readings of the air line;
- 6) Collect pH, specific conductance and temperature readings in the field;
- 7) Rinse outside of sample bottles and contain the rinsewater for disposal into the air stripper;
- 8) Sampling personnel should wear protective coats for splash protection;
- 9) Plastic sheeting should be spread around the wellhead to contain spillage and splashes, and on which to place sampling equipment;
- 10) The facility's field log book needs more detail as to the sampling times, sampling order, calibration tests, etc.;
- 11) Duplicate samples should be collected during each sampling event to check the laboratory for repeatability;
- 12) Repair the crimped air hose on monitoring well MW-21;
- 13) Report the first four air hose readings, convert the readings into feet to the nearest .01 foot and average the last three footages to obtain the depth to water;
- 14) Measure the turbidity of the ground water samples; and
- 15) All of the VOA field blank containers shipped from the laboratory contained air bubbles.

RCRA COMPREHENSIVE GROUNDWATER MONITORING EVALUATION
STATE OVERSIGHT EVALUATION REPORT

I CME Preliminary Preparation

A. Coordination with State (inspector).

1. Proposed State Sampling plan

° Was the sampling provided to 6H-CX prior to inspection (written or verbal)? Yes X No

° Describe sampling plan (No. of sample points, parameters, matrix, etc.) Sparton sampled nine (9) ground water monitoring wells. Seven of the monitoring wells are screened in the upper saturated zone (MW-9, MW-14, MW-15, MW-16, MW-18, MW-21, and MW-22) and two of the wells are screened in the lower flow zone (MW-19 and MW-20). NMEID chose to split samples on MW-15 and MW-22 which are screened in the upper saturated zone.

2. Logistics

° Did the State inspector adequately arrange the logistics of the inspection? Yes X No

° Did EPA request documents from the State? Yes No X
(i.e. facility sampling plan, sample data, assessment plans)
If so, were they transmitted in a timely manner? N/A Yes No

3. Equipment Requirement (explain if the State was prepared and/or if facility equipment was used)

The monitoring wells were purged by dedicated bladder pumps and the samples were collected into containers furnished by Sparton and NMEID. The inspectors observed purging operations at all of the wells. Specific conductance pH and temperatures were measured by NMEID at the two wells that they split samples. Sparton did not measure pH, specific conductance and temperatures.

II Inspection Evaluation

A. Site Entry

1. Did the State present credentials and adequately introduce themselves?

Yes X No

2. Was entry denied by the facility?

Yes No X

If yes, what alternative course of action was taken by the State? _____

3. Did State adequately inform facility of inspection goals and purposes at Entrance Interview?

Yes X No

Comments The State explained the purpose of the CME inspection including the inspection tasks, procedures and schedule.

B. Sampling

1. Was the State prepared?

Yes X No

Comments: The State had all equipment calibrated and ready for the inspection. A complete record review was conducted prior to the inspection.

2. Was the State sampling plan followed?

Yes X No

If no, comment. _____

3. Did sampling performed meet CME goals?

Yes X No

Comment: The CME provided documentation that Sparton is conducting ground water tasks in a well organized and proper procedure. All CME goals were met.

C. On-site Inspection

1. Were all RCRA units requiring ground-water monitoring physically inspected?

Yes X No

If no, comment _____

- 2. Were well locations checked? Yes No
- 3. Were well water levels checked? Yes No
- 4. Were well depths checked? Yes No
- 5. Did the State use a bound inspection logbook? Yes No
- 6. Were any photographs taken by the State? Yes No

Comments: The NMEID inspector checked each monitoring well on the Sparton property. However, the inspector did not view the four recently-completed off-site wells.

D. Facility Observations

- 1. Did the inspector demonstrate or obtain knowledge of the facility processes and an understanding of its RCRA history with respect to the ground water monitoring system? Yes No
- 2. Did the inspector note the regulatory or technical deficiencies? Yes No
- 3. Did the inspector fail to identify any hazardous waste management areas that require ground water monitoring? Yes No
- 4. Did the inspector review latest sample data, field logbooks, hydrogeologic information, sample plan, etc.? Yes No

Comments The NMEID inspector had reviewed Sparton's reports and records. All technical deficiencies were noted and reported to the facility during the exit interview.

E. Exit Interview

- 1. Was an exit interview conducted Yes No

2. Did the State comment to the facility on adequacy of the well system?

Yes X No

Exit Interview Comments The State inspector conducted a good exit interview. She stated that although she found no Regulatory Violations during the inspection, she had noted some issues which would improve Sparton's sampling events and ground water monitoring system.

III. General Comments on State Inspection Performance

Suzanne Moore-Mayne of NMEId conducted the CME inspection in a in a very professional manner. She had prepared for the inspection by conducting a complete file review and had checked and packed all equipment for the inspection. The facility was briefed completely by her as to what the CME inspection is and what was expected of them. Sparton had all records and materials prepared for the entrance in view and was ready to refer to them as requested.