



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202

*File
Sparton - Blue
Dispute Resolution:*

September 24, 1990

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Richard D. Mico
Vice President and General Manager
Sparton Technology, Inc.
P.O. Box 1784
Albuquerque, New Mexico 87103



*EPA - ST
on Monitor
Well
Placement*

RE: Review of Proposed Monitoring Well Installations and
Schedule of Implementation and or Administrative Order on Consent
For Sparton Technology, EPA I.D. No. NMD083212332

Dear Mr. Mico:

On August 28, 1990, the U.S. Environmental Protection Agency, Region 6 (EPA) met with representatives of Sparton Technology, Inc. (Sparton), to resolve a dispute initiated on July 11, 1990, by Sparton, over whether Sparton should be granted an additional extension in their timeframe to submit the Draft RCRA Facility Investigation (RFI) Report required under U.S. EPA Docket Number VI-004(h)-87-H (Order). During the course of that meeting, it became apparent that there was another potential dispute concerning the number of wells necessary to define the extent of contamination from the facility. In order to address the existing dispute and the potential dispute, it was determined in the August 28, 1990, meeting that technical representatives from Sparton and EPA would meet on September 4, 1990, to come to some agreement on the most logical placement of wells for plume definition, based on present knowledge. Following the September 4, 1990, meeting, Sparton would propose well locations with an expedited schedule for installation and monitoring on September 10, 1990, which EPA would review by September 17, 1990. If both parties were in agreement on the relative spacing of wells (and, therefore, probable number of wells, assuming the next round of wells prove to be clean) necessary to define the plume, then upon agreement of a plan and schedule to install and sample wells, the Order will be modified to extend the due date. If, however, agreement cannot be reached, I will reach a determination on the dispute and inform both parties of the decision. EPA has completed its review of the Sparton Technology proposal submitted to EPA on September 10, 1990 and will approve it with the following modifications. EPA appreciates the effort in this proposal and Sparton's spirit of cooperation.

In the September 4, 1990, meeting between the EPA technical staff and Sparton consultants, a best effort was made by all concerned to determine monitoring locations for ground water plume definition. Locations approved by EPA are: an upper lower flow zone well nested with Monitoring Well - 51 (MW-51), Location A on the attached map; a well nest in the upper and upper lower flow zone proximal to the intersection of Eagle Ranch Road and Adobe Wells Drive, Location B on the map; a well nest in the upper and upper lower flow zone north of Arrowhead Avenue on Bryan, Location C on the map; and a well in the upper flow zone close to the intersection of Congress Avenue and Buckeye Street (Location D).

Differences in what was discussed at our September 4, 1990, meeting and the submitted proposal are essentially at Locations C and D. Sparton has proposed upper flow zone and upper lower flow zone wells at location C, as opposed to only the upper flow zone well as suggested by EPA. At Location D, the upper lower flow zone well has been omitted, leaving an upper flow zone well. These changes are acceptable to EPA.

EPA remains concerned regarding migration of contaminants to the north of Monitoring Well No. 46 (MW-46), in the upper lower flow zone. Immediately upon completion and stabilization of well nests B and C, water levels from the B and C upper lower flow zone wells and MW-46 should be collected and supplied to EPA. As trichloroethylene (TCE) concentrations in MW-46 are quite high (4200 parts per billion (ppb)) and flow directions are somewhat tenuously defined, this information will promptly determine the need for additional data collection north of MW-46. As implied in your letter of September 10, 1990, the finality of this drilling program is based on the analytical results of two data suites. TCE concentrations less than 100 ppb comprise one suite. The other suite is composed of the New Mexico Ground Water Quality Standards. Although EPA does not anticipate any changes in historical trends for the comprehensive analytical results, these data and the corresponding allowable levels are to be used for definition of the ground water plume boundary. Historically, it appears that elevated TCE concentrations have been accompanied by elevated concentrations of other compounds. We anticipate that this trend will remain consistent. Please remain cognizant however, that definition of the plume boundary considers all detected compounds. TCE is only a rapid turnaround indicator compound.

As stated in your September 10, 1990, letter, the drilling conclusions defined in the proposal are based on the assumption that testing results do not reveal concentrations in excess of agreed upon levels of contaminants. These levels are 100 ppb for TCE and human health standards for other compounds.

If these levels are exceeded, EPA representatives are available for consultation on EPA's requirements for additional well placement. The city and county have been extremely cooperative regarding access so this should not be a continuing issue.

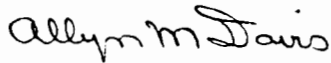
The two significant revisions required by EPA in this proposal pertain to sampling for full suite chemical analyses and utilization of that data for plume definitions, and the schedule for these full suite analyses. It is not clearly stated in the September 10, 1990, proposal that ground water samples for full suite analyses will be collected from all wells, although it is implied on the revised RFI schedule attached to the Sparton proposal. It will be more effective to collect full suite ground water samples immediately after, or at the same time, as samples for rapid turnaround TCE analysis are collected. The intent of using rapid turnaround analyses for TCE only was to have an indicator compound. The TCE indicator is to be used for initially determining the necessity of additional well installation, avoiding the expense of rapid turnaround for full suite analyses. Barring the necessity for additional well installation, full suite sampling would be completed in October 1990, rather than in late November to December 1990, as proposed.

Full suite sampling of the ground water in October 1990, will allow ample time for Sparton's receipt and interpretation of analytical data. The full suite analysis must be compared to TCE results and all data completely presented and interpreted in the RFI Report.

Please respond with these modifications to your proposal to Guy L. Tidmore, in accordance with Part IV.A.5 of the Order, within five (5) business days of your receipt of this letter. If, upon receipt and review of your modified plan, the required changes have been incorporated, a modification of the Order, Task VI.C., regarding the Draft RFI due date will be made to change that date to December 17, 1990. Further, upon receipt of the required modifications, EPA will consider the Dispute Resolution invoked by Sparton July 11, 1990, to be resolved. If you believe that any issues remain unaddressed, or if you have any questions, please contact Guy L. Tidmore in accordance with Part IV.A.5 of the Order. He may be reached by telephone at (214) 655-6480.

We anticipate that the efforts by all concerned will result in the efficient and conclusive termination of this study. EPA looks forward to receiving the comprehensive RFI Report, covering all required elements, on December 17, 1990.

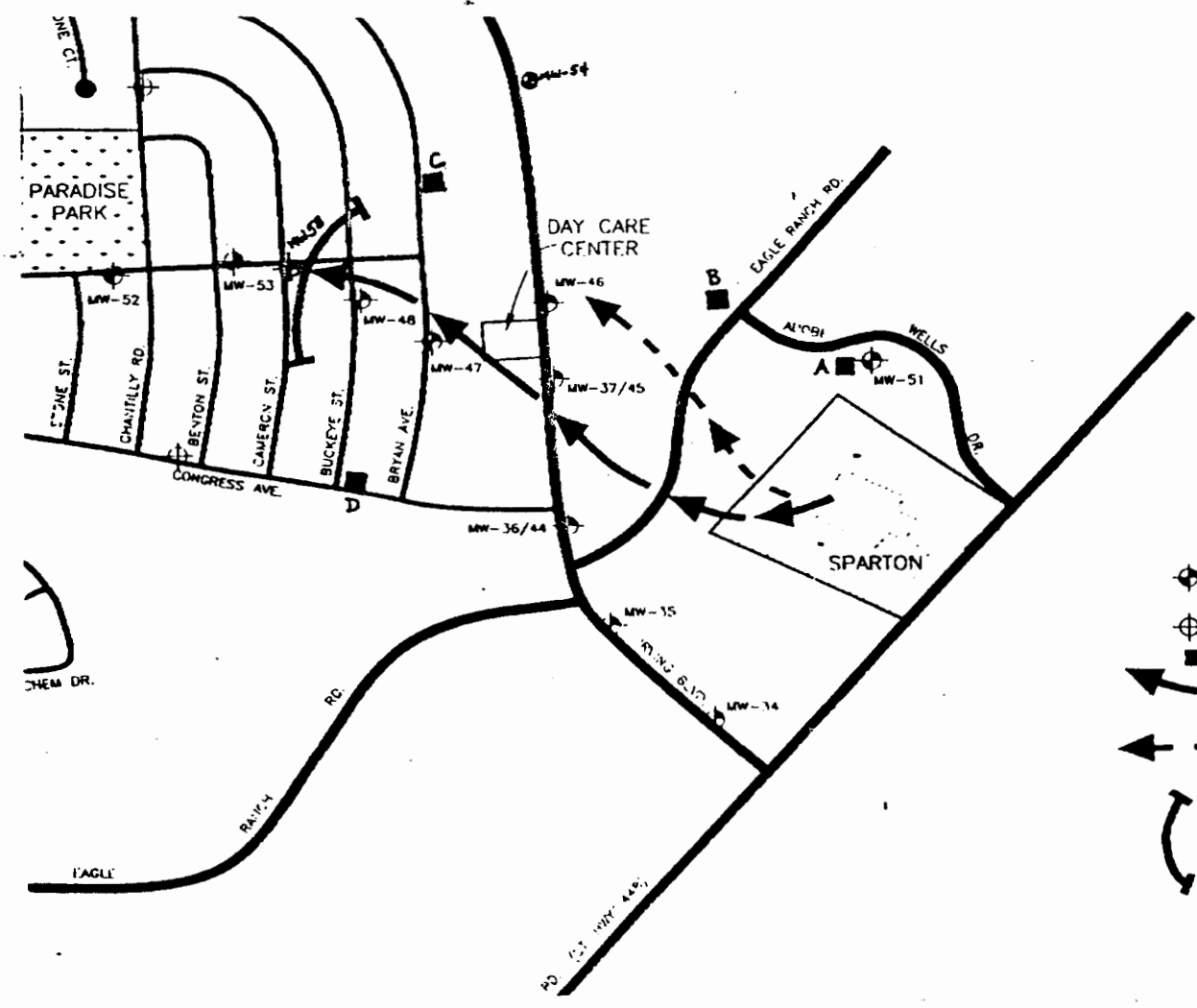
Sincerely,



Allyn M. Davis
Director
Hazardous Waste Management Division (6H)

Enclosure

cc: Suzanne Moore-Mayne, NMEID



	UPPER F.Z.	UPPER-LOWER F.Z.
A	-	✓
B	✓	✓
C	✓	✓
D	✓	-

LEGEND

- EXISTING OFF-SITE UPPER/LOWER FLOW ZONE MONITORING WELL OR PIEZOMETER
- COUNTY PERMITTED WELL LOCATION
- PROPOSED WELL LOCATIONS
- DIRECTION OF UPPER FLOW ZONE GROUNDWATER MOVEMENT
- DIRECTION OF UPPER-LOWER FLOW ZONE GROUNDWATER MOVEMENT
- LEADING EDGE OF PLUME

