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ENVIRONMENT DEPARTMENT

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MEMORANDUM

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TO: File, ST/red/92

FROM: Jane Cramer, Technical Program *JAC*

THROUGH: Benito Garcia, Bureau Chief, *ed*  
Ed Horst, Program Manager, and  
Steve Alexander, Technical Supervisor

DATE: December 18, 1992

RE: Corrective Measure Study (CMS), Hazardous and  
Solid Waste Amendments Act (HSWA) Permit, and  
Post-Closure Care Permit (PCCP) for Sparton  
Technology, Inc. (STI), Albuquerque, New  
Mexico.

Attendees:

Jane Cramer, Technical Program  
Steve Alexander, Technical Supervisor  
Marc Sides, Permitting  
Vince Malott, EPA Region VI  
Rich Mayers, EPA Region VI

Hazardous and Radioactive Materials Bureau (HRMB) staff met with EPA Region VI staff on Thursday, December 17, 1992 to discuss the CMS, HSWA Permit and PCCP and to coordinate EPA and HRMB efforts.

The volatile organic compound (VOC) plume at STI presently extends 2000 feet northwest from the STI property. Regional groundwater flow is southwest, however a section of the unlined Corrales main canal is acting as a local aquifer recharge point and has altered flow to the northwest.

The aquifer beneath STI has two discrete flow zones:  
upper flow zone (UFZ), and  
lower flow zone (LFZ).

VOCs plumes have been detected in both zones. The facility is currently conducting on-site pump and treat remediation.

June 1991 groundwater monitoring well sampling results for all wells showed declining concentrations compared to earlier sampling events and showed that concentrations decreased with depth. This seemed to indicate that the vertical and horizontal extent of the plumes were generally known and that the plumes were no longer expanding.

September 1992 groundwater monitoring well sampling chemical results, however, showed these differences:

Trichloroethylene (TCE) in UFZ monitoring well, MW-53, located at the westernmost extent of the plume, was measured at 13 ppb on September 1992. In June 1991, TCE was reported as a non-detect. This change indicates expansion of the plume.

TCE in LFZ monitoring well, MW-32, located on the STI property and within the plume, was measured at 53 ppb in September 1992. TCE in adjacent wells completed in the UFZ was measured at lower levels at the same time, suggesting the presence of a dense non-aqueous phase liquid in MW-32.

Based on this understanding of the situation at STI, the items outlined below were the main points discussed concerning the minimum requirements of an acceptable CMS at the December 17 meeting.

1. EPA has reviewed the CMS and concluded the following:
  - a. EPA disagrees with STI CMS selected remedy of no further action (NFA).  
(NFA includes continuation of on-site pump and treat already underway)
  - b. EPA recommends:  
off-site pump and treat, and additional on-site source removal (vapor extraction).
  - c. Rationale for these recommendations is:  
aquifer is the sole source drinking water supply for Albuquerque (Class I aquifer), therefore contamination above health-based limits (MCLs) cannot be left in the water; instead it must be restored to its beneficial use (drinking water).

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- d. EPA recommends point-of-compliance wells: MW-9, 12, 15, 16, 18, 21, 23, 24, 25, 26, 27, and 33 for the UFZ; and MW-19, 20, 29, 30, 32, 38, 39, 41, 42, 43 for the LFZ.
- e. EPA wants state concurrence on above items.
- f. HRMB gave tentative concurrence to items a through c, however, the total number of point-of-compliance wells (item d) has not been agreed upon at this time.

EPA comment letter on items a through c will go out: Dec 30 '92  
ST response is expected: Jan 30 '93  
EPA will review ST's response by: Feb 28 '93

Possible incorporation of CMS/CMI into the PCCP was also discussed. Resolution of this issue will await further information from EPA.

HSWA has no bearing on these topics.

cc: Barbara Hoditschek, Program Manager