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JUDITH M. ESPINOSA SECRETARY

RON CURRY DEPUTY SECRETARY

MEMORANDUM

TO: File

FROM: (^NRonald Kern, Environmental Specialist

DATE: September 30, 1993

SUBJECT: Summary of Informal Meeting Between HRMB and EPA (Region VI) to Discuss Sparton Technology, Inc.

An informal meeting was held at HRMB on September 29, 1993 (2:15 PM to 3 PM) to discuss current and future regulatory concerns related to the ongoing investigation of Sparton Technology, Inc. (ST), Albuquerque, New Mexico. Attendees at this meeting were Vincent Malott (EPA, Region VI) and Ronald Kern (HRMB).

Topics of discussion included the following:

1) An informal meeting has been proposed to be held at EPA Region VI HQ in Dallas during early October, 1993. Attendees for this proposed meeting are scheduled to include Jan Appel (V.P. of ST), Pierce Chandler (former HDR consultant to ST), and Vincent Malott. Probable topics for discussion at this meeting are to include: Possible use of MW-32 (an on-site monitoring well screened in the Lower Lower Flow Zone [LLFZ] which has possible DNAPL) as a deep recovery well for remedial measures; possible methods/techniques for getting the leading (downgradient) edge of the contaminant plume(s) [TCE, TCA, DCE, PCE, and Cr] under control (containment, plus potential remediation); status of the CMS and prioritizing the corrective measure techniques most applicable to containment/remediation of the groundwater/vadose zone contamination at ST. Vince stated that he would provide HRMB with details of the discussions and any progress resulting from this meeting.

2) ST has permanently closed their Coors Rd. facility (i.e. no further manufacturing or production) which had been the source for the hazardous waste discharge/release. This has three interesting consequences. First, different groups (e.g. PNM, and Westside Jeep-Eagle automobile dealership) have apparently expressed interest in buying the property with buildings. Liability concerns and how such a transaction would affect the contaminant investigation/remediation are currently unknown. Secondly, it is possible that ST might be more amenable to accelerating the investigation/remediation of the contaminant plume(s) due to facility closure economics and possible sale of the property. Thirdly, because ST discharges no more facility process water to the sewer system, it is possible that more "pump and treat" water (from current on-site, plus possible off-site, recovery wells) may be discharged to the sewer system and POTW under ST's current discharge permit. This is potentially significant because a large volume, on-site and off-site recovery well network with air stripping may be the most feasible technique for containment/remediation of the VOC contaminant plume(s).

3) The RTC (Resolution Trust Company) monitoring well on NM Federal Credit Union property (northwest of ST and immediately overlying the off-site contaminant plume) is located within a topographically low area. Vince is concerned about the possibility of infiltration of material into this monitoring well via surface runoff. Information on this well is sketchy at best, and it was apparently utilized for one sampling event with unknown results. Vince would like to see this monitoring well plugged and abandoned so that it can cause no interference with the current ST investigation.

4) Acknowledgment that the current monitoring well network does not adequately address <u>extent</u> concerns of the contaminant plume(s), particularly in light of the recent (7/93) CME conducted by HRMB. Analytical data from this CME indicated that the VOC + Cr plumes have continued to "grow" in a downgradient direction and have not been "stopped" by the IM "pump and treat" procedures. Basically, this means that the contaminant plume(s) have essentially spread downgradient beyond the majority of the monitoring well network.

5) Vince has requested that ST provide EPA with the following information:

a) Copy of ST's air quality discharge permit.

b) Copy of ST's wastewater discharge permit.

c) Calculations of emission rates of the air stripper.

d) Copy of the current State Engineer's permit for groundwater recovery at ST.

cc: Steve Alexander, Technical Compliance Program Manager Marc Sides, Permitting Program