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Marc S. MCS

January 6, 1995

Red File
Sparton Technologies
XI
Thanks
Marc



STATE OF NEW MEXICO
ENVIRONMENT DEPARTMENT

R. Jan Appel
Vice President and General Counsel
Sparton Corporation
2400 East Ganson St.
Jackson, MI 49202

RE: Requirements for Characterization of Contamination
at Sparton Technology, Inc.'s Coors Road Facility,
Albuquerque.

Dear Mr. Appel:

The Remediation Section of the Ground Water Protection and Remediation Bureau of the New Mexico Environment Department (NMED) has received your letter dated December 12, 1994. This letter is in response to requests made of Sparton Corporation (Sparton) by NMED at a meeting on November 7, 1994. These requests were made after reviewing the existing information on ground water contamination resulting from prior waste management practices at the Sparton facility located on Coors Road in Albuquerque. NMED acknowledges and supports Sparton's efforts overseen by the U.S. Environmental Protection Agency (EPA) to install an on-site pump-and-treat system. However, NMED is aware that extensive off-site contaminant migration has occurred and continues to occur, and that complete horizontal and vertical plume definition has not been accomplished.

Gary Johnson
Governor

Mark Weilder
Secretary

Deputy Secretary

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Harold Runnels Building
1190 St. Francis Drive



The requests made of Sparton at the November 7, 1994 meeting were:

- 1) To modify the quarterly sampling program to include selected off-site monitor wells;
- 2) to install 2-3 monitor wells in the third (deep) flow zone as this zone is effectively unmonitored;
- 3) to install additional upper flow zone monitor wells to identify the downgradient extent of the plume.

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In your letter of December 12, 1994, you indicate that Sparton intends to move forward only on request #1 at this time, the reason being the desire to wait until Sparton receives comments from the EPA on the Draft Corrective Measures Study Report (CMS) submitted in 1992. NMED finds this reason to be unacceptable. This study is already over two years old, and more recent sampling has shown the plume to have expanded. It also is unclear whether new off-site wells will be installed as a result of the EPA's eventual approval of the CMS.

At the November 7, 1994 meeting, Sparton was advised that New Mexico Water Quality Control Commission (WQCC) Regulations also apply to your facility. Section 1-203.A.5 requires the owner/operator of the facility where a discharge took place to take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge. In order to adequately contain and remove or mitigate the damage to ground water, it is necessary to fully define the extent and character of the contamination. Full characterization of the plume has not yet been accomplished.

Therefore, under WQCC authority, NMED requires additional well installation in order to fully define plume geometry and the extent of WQCC Section 3-103 standard violations in ground water. At a minimum, additional wells downgradient of the source area are needed to monitor contaminant levels in the third flow zone and monitor wells are needed to determine the downgradient extent of the plume in all flow zones, as described above.

Pursuant to WQCC regulation 1-203, please deliver to this office by February 17, 1995 a proposal for full characterization of the extent and magnitude of ground water contamination beneath and surrounding the Sparton facility. This request is not meant to be duplicative of what Sparton has done previously or is now doing under the authority of the EPA. Those efforts may be incorporated by reference in your proposal.

In addition, NMED believes that Sparton's characterization of vadose zone contamination is incomplete. NMED is not requiring additional vadose-zone work at this time. However, vadose zone characterization may be required later if the CMS does not fulfill this task.

Once again, NMED supports the efforts of Sparton under the authority of the EPA to install an on-site, remediation system. This letter is an attempt to gain Sparton's voluntary compliance with WQCC regulations in addressing off-site contamination. If you

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have any questions please call Robert Pine, hydrologist with the Remediation Section, at 505/827-0178, or Dennis McQuillan, Program Manager of the Remediation Section, at 505/827-2831.

Sincerely,



Marcy Leavitt, Chief
Ground Water Protection &
Remediation Bureau

ML:RP:rp

cc: Vincent Malott, Hazardous Waste Management Division, RCRA
Enforcement Branch (6H-CX), U.S. Environmental Protection
Agency, 1445 Ross Ave., Dallas, TX 75202-2733

Norm Gaume, Public Works Department, City of Albuquerque, P.O.
Box 1293, Albuquerque, NM 87103

Garth Graves, Dist. Manager, NMED Dist. 1

Ron Kern, NMED HRMB

Rob Pine, NMED GWPRB

Baird Swanson, NMED GWPRB, Dist. 1