



City of Albuquerque

P.O. BOX 1293 ALBUQUERQUE, NEW MEXICO 87103

PUBLIC WORKS DEPARTMENT

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July 20, 1995

United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Attention: Allyn M. Davis, Director, Hazardous Waste Management Division

Subject: Sparton Corporation Coors Road Facility

Dear Mr. Davis:

Thank you for including the City of Albuquerque in the review of your draft RCRA Statement of Basis. I am replying as co-chair of the city/county committee charged with implementation of the Albuquerque/Bernalillo County Ground Water Protection Policy and Action Plan (GPPAP) and as Water Resources Manager for the City of Albuquerque Public Works Department which owns and operates the public water system providing service to 455,000 customers. Our customers include 88% of Bernalillo County residents. The GPPAP, which has been formally adopted by both the City of Albuquerque and Bernalillo County, is a comprehensive source water protection and wellhead protection plan. A copy is attached for your use.

The City of Albuquerque and Bernalillo County rely on the Environmental Protection Agency and the New Mexico Environment Department to take effective action to require remediation of contaminated ground water because locally we have no authority to require clean-ups. Our GPPAP states that as a matter of policy "[T]he City and County shall promote the vigorous enforcement of laws and regulations related to ground-water protection..." and shall "...seek the expeditious remedy of...contamination..."

The actively spreading plume of chlorinated solvents emanating from the Sparton Corporation Coors Road Facility is contaminating ground water that is needed for drinking water supply. It is located in an area designated by the GPPAP as crucial for ground water quality protection. The City's current master plan designates this area for a future well field. Ground water flow simulations have been conducted for various water supply options using the comprehensive model of the Albuquerque

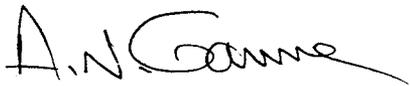
Basin published by the U. S. Geological Survey in January 1995 as part of the development of Albuquerque's long-range water supply plan. These simulations show water table declines in the contaminated area of more than 100 feet by 2035 for options that continue to rely on ground water as the sole source of supply for areas west of the Rio Grande. Clearly, this water will be used for drinking water supply.

The Statement of Basis indicates the point of compliance (page 19, part B.) will be established on-site around the former hazardous waste management area. We hope that you did not intend this to mean that the substantial contamination that has been allowed to continue to migrate off-site will not be remediated also to final ground water clean-up goals and strongly object if that is EPA's intent.

We appreciate the Environmental Protection Agency's new initiative to address this problem. The remedy implemented in 1988 at Sparton Technologies Inc. has not addressed the substantial off-site migration of the contamination. This contamination must be defined, confined, and cleaned up. The City of Albuquerque prefers Alternative 5 as described in your draft Statement of Basis because of its potential for decreasing the time frame for meeting remediation goals.

Please contact me at 768-3631 if you have any questions regarding this letter.

Sincerely yours,



A. Norman Gaume, P.E.
Manager, Water Resources Program

c: Martin J. Chavez, Mayor
Juan Vigil, Bernalillo County Manager