

SPARTON TECHNOLOGY: SITE CHRONOLOGY

Steven J. Cary
October 23, 1995

- 1961 Sparton Technology, Inc., opens Coors Rd. facility; discharge spent cleaning solvent to an unlined sump and aqueous plating wastes to two ponds.
- 800818 Sparton notifies EPA of its status as a generator and storer of hazardous waste.
- 8010 Sparton discontinues dumping of solvents into sump; informally closes sump (non-RCRA closure) by removing waste and backfilling with sand. [HSWA unit]
- 8105 use of Old Drum Storage Area discontinued.
- 830106 Sparton submits Part A permit application and identifies itself as a facility generating and storing hazardous wastes from non-specific sources, F wastes (001, 002, 003, 005, 006).
- 830201 EPA informs Sparton of ground water monitoring violation (i.e., lack of GW monitoring) under 40 CFR 265.90(a).
- 8305 ground water wells installed to monitor East and West Ponds.
- 8308 disposal of plating wastes discontinued into East and West Ponds. [RCRA units]
- 8310-11 seven additional monitor wells installed.
- 8312 monitor wells sampled by Harding Lawson Associates (HLA), consultant for Sparton.
- 840319 HLA reports discovery of contamination in monitor wells near East and West Ponds; contaminants include trichloroethylene (TCE), 1,1,1-trichloroethane (TCA), methylene chloride, 1,1-dichloroethylene (DCE), acetone, and others, some at ppm levels.
- 840620 EPA samples monitor wells. Analytical results show presence of TCE, TCA, methylene chloride, chromium, and others, some at tens of ppm.
- 8410 HLA samples monitor wells at the facility for Sparton.
- 850313 Analytical results from 8410 monitor well sampling reported by HLA confirm ppm levels of organic solvents.
- 860630 HLA submitted Soil Investigation of the Unsaturated and Upper Saturated Zones.

- 8612 Final closure of sump and ponds approved by NMED.
- 870518 closure plan approved by NMEID covering East Pond, West Pond, Sump, and Old Drum Storage Area.
- 8706 Agreement in Principle signed among EPA, Sparton and NMED.
- 870723 Corrective Measures Study Report submitted by HLA on behalf of Sparton.
- 880922 Final Administrative Order on Consent signed between EPA and Sparton. Directs Sparton to undertake (A) Corrective Actions, (B) Sampling, and (C) Reporting, among others. Corrective Actions include (1) Interim Measures, (2) a Corrective Action Plan, and (3) Corrective Measures Implementation, among others. Interim Measures (IMs) include extraction, treatment and disposal of ground water from the uppermost flow zone capable of preventing further off-site migration of contaminants. Other IMs included installation and sampling of additional monitor wells, evaluation of the extent of hydraulic interconnection between flow zones. Order mandates implementation of a Corrective Action Plan that includes a RCRA Facility Investigation (RFI) and a Corrective Measures Study (CMS).
- 881028 IM Work Plan submitted by Sparton, as required by AOC.
- 8812 GW recovery system for upper flow zone initiated with air stripper, as required by AOC.
- 890309 RFI Work Plan approved.
- 8904 IM Work Plan approved.
- 8910 Draft I of RFI submitted.
- 9007 Draft II of RFI submitted.
- 9012 Draft III of RFI submitted.
- 9108 Draft IV of RFI submitted.
- 910806 EPA has two public informational meetings regarding ground water cleanup programs.
- 9112 Draft V of RFI submitted.
- 9205 Draft VI of RFI submitted.
- 9207 EPA approves RFI.

- 9208 Report on effectiveness of existing GW recovery system.
- 9211 Draft CMS submitted, as required by AOC.
- 9307 NMED sampling suggests plume expansion downgradient to NW and perhaps SW.
- 9312 Sparton sampling confirms plume expansion past outermost monitor well to NW.
- 940203 NMED informs EPA about grave concerns about contaminant plumes.
- 940210 EPA and Sparton meet to discuss CMS; Sparton happy with containment; meeting was inconclusive.
- 940221 NMED meets internally to identify other possible state authorities by which to seek remediation.
- 940503 ONRT transmits first letter to Sparton formally requesting voluntary cooperative NRDA.
- 940609 Sparton responds in writing to ONRT's request for cooperative NRDA, suggesting a meeting may not be necessary.
- 940624 NMED sends letter to Sparton asking for a meeting with Sparton to discuss a cooperative NRDA.
- 940927 EPA hosts public Open House to discuss status of Sparton facility.
- 941029 Sparton sampling re-confirms plume expansion to NW.
- 941103 NMED tells EPA that CMS report is inadequate.
- 941107 ^{COPIED} NMED tells Sparton at meeting in Santa Fe that better plume delineation needed.
- 950106 ^{COPIED} NMED sends letter to Sparton, cites WQCC 1-203, responds to Sparton's letter of December 12, 1994, and continues to require a variety of site characterization activities.
- 950310 Sparton delivers letter to NMED responding to NMED's January 6, 1995 letter. Sparton claims plume is adequately defined and NMED lacks authority to require more work of Sparton.
- 950331 ^{COPIED} NMED sends another letter to Sparton, cites WQCC 1-203, and asks for additional ground water monitoring effort. This letter is coordinated with ONRT.
- 950404 ONRT sends letter to Sparton suggesting injuries to natural resources and asking

for additional ground water monitoring effort. This letter is coordinated with NMED.

- 950505 Sparton responds to NMED's letter of March 31, 1995. Sparton cites Agreement in Principle and states that NMED lacks Water Quality Act authority over the Sparton situation. Even if NMED did have authority, Sparton suggests that all problems are being addressed via RCRA.
- 950511 Sparton responds to ONRT's letter of April 4, 1995. Sparton asks for patience with the RCRA route of action.
- 950512 EPA and NMED agree that NMED is full partner in regulatory process.
- 950614 EPA seeks input from ONRT on draft Statement of Basis (SB).
- 950614 NMED letter to Sparton explains that NMED has power to require expedient remedy.
- 950718 ONRT sends letter to Sparton stating desire for coordinated remedy and restoration. ONRT has option to seek damages.
- 950809 EPA issues SB describing proposed remedy for site. Proposed remedy is Alternative 4, which includes additional investigation to characterize the plume, expanded ground water recovery, and soil vapor extraction. SB also summarizes the remedial alternatives that were not selected. SB announcement opens 45 day public comment period. Public meeting scheduled for September 12, 1995.
- 950822 Sparton sends letter to EPA presenting written notice of a dispute pursuant to the 1988 AOC. Letter makes various assertions of why SB is out of line and requests postponement of comment period.
- 950907 EPA grants postponement to allow Sparton to defend its position, but EPA denies Sparton access to the dispute resolution process under the 1988 AOC.
- 950912 Mayor Chavez letter to EPA expresses concern about delays and states City's plans to use that water.
- 950913 EPA meets with Sparton to discuss Sparton's concerns about SB and EPA's preferred remedy.
- 951002 EPA sends letter to Sparton summarizing results of 9/13 meeting, responding to Sparton's questions about the process, and transmitting EPA's comments on the 1992 draft CMS. EPA gives Sparton 30 days to submit a final CMS.

PROJECTED EVENTS

- [951106 EPA will receive Sparton's revised CMS and comments on proposed remedies.]
- [951231 EPA will complete review and will also solicit State and City comments. EPA will update the SB based on the new information and re-propose a site remedy.]
- [960115 EPA will re-start the 45-day public comment period; public meeting will be scheduled for late February.]
- [960331 EPA will prepare response to public comments and select a final remedy. EPA will close out the old AOC with Sparton and send Sparton a new draft AOC for negotiation. AOC will require Sparton to implement EPA's selected remedy. Sparton will have 60 days to show their intent to negotiate in good faith.]
- [960531 If no cooperation from Sparton, then EPA will issue Unilateral Order (UAO) for Sparton to implement EPA's selected remedy.]