



FAX TRANSMISSION SHEET

U.S. EPA, REGION 6
ENFORCEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH
TECHNICAL SECTION

TRANSMISSION DATE: March 26, 1996

<u>TO:</u> Steve Cary - Deputy Director - ONRT	<u>Phone #:</u> 505-827-1035	<u>FAX #:</u> 505-827-1049
<u>FROM:</u> Vincent Malott (6EN-HX)	<u>Phone #:</u> 214-665-8313	<u>FAX #:</u> 214-665-7446
<u>CC:</u>	<u>Phone #:</u>	<u>FAX #:</u>

Total Number of Pages: 5 If all pages were not received, please contact the sender.

NOTE: Copies sent to Norman Gaume, Rob Pine, Steve Cary, and Ron Kern.

ALSO NOTE TASK 4: what is the interest in receiving soil gas data as part of an extension request.

ALSO NOTE TASK 3: regarding meetings and input from State and City of Albuquerque on the referenced issues. What is a more realistic timeframe, other than the requested 56 days?

If possible, please give me a call this morning and discuss the issues.

→ maybe could be done after remediation selection as part of final site characterization

do we need to be careful that correct ME not be too different than draft, so no additional public input needed?

SPARTON

SPARTON TECHNOLOGY

March 25, 1996

Desi A. Crouther, Chief
Hazardous Waste Enforcement Branch
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Sparton Technology, Inc./Coors Road Facility

Dear Mr. Crouther:

Thank you for your prompt response to my March 18, 1996 letter. The purpose of this correspondence is to respond to your request that certain information be provided to you by the close of business on March 25, 1996. At a later time, we will respond to several statements made in your letter with which we disagree. I do believe it is important, however, at this time to alert you to two statements made in your letter where it appears misinformation has been shared with you. The original draft CMS was due 120 days after approval of the final RFL, not the 90 days referenced in your letter. Secondly, in our November 6, 1995, submission to EPA, we did submit proposed changes to the draft CMS report to address concerns identified by EPA. We did not reissue another draft CMS, because we were told by EPA that additional comments would be forthcoming, and it seemed to us inefficient to revise the document twice. In other words, as of November 6, 1995, we had revised the draft CMS report as requested by EPA.

Answers to the questions raised in your March 20, 1996 letter are as follows. Sparton's contractor estimates that its "percentage of progress" is 15%. That contractor has had six professionals plus clerical support working on the revisions. So far, they have expended in excess of two-hundred hours on that project, since receiving EPA's March 1, 1996 comments.

In order to assist you in understanding how that contractor is approaching this project, we attach a memo that outlines its approach, as well as a time line for completing its work.

On behalf of Sparton, we again request a sixty (60) day extension for the submission of a final CMS.

Yours very truly,

R. D. Mico

Richard D. Mico
Vice President and General Manager

Attach.

cc: R. Crossland
V. Malott

OGC-000319

GWB-00521-SPARTON

BLACK & VEATCH

MEMORANDUM

**Sparton
Coors Road Facility
60-day CMS Response Extension**

**BAV Project 26602.100
BAV File B
March 20, 1996**

**To: Jim Harris/Jan Appel
Thompson & Knight**

From: Pierce L. Chandler, Jr. *PLC*

On March 7, 1996, Sparton received comments from USEPA on the Draft CMS Report dated November 6, 1992. The comments are extensive and add new technologies/methodologies to those already contained in the CMS.

There are multiple tasks, both required and implicit, in the EPA comments. Because of the lapse of over three years in receiving these comments, a response time of only thirty days is unrealistic. Such a short response time would not allow any substantive revision or update to the Draft CMS Report. A minimum of a 60-day extension (90-day total) is needed to respond to the EPA comments as more fully detailed in the following paragraphs.

Task 1. Revise, update, supplement and incorporate recently developed information into the hydrogeologic/constituent characterization data base. For example, produce final analyses of the 4-1/2 years of constituent data obtained since the RFI.

0 30 days OK

Task 2. Research, review, analyze, and summarize published information/documentation on available technologies/methodologies produced since early 1992. This information may affect selection, implementability, and cost information contained in the existing Draft CMS Report. This information is needed to bring the CMS information forward into 1996. In addition, detailed information needs to be generated for additional methodologies and/or detail requested by EPA.

any real changes? Battell study

0 30 days OK

whiskies?

Task 3. Responding to EPA comments will also require input from the State and City of Albuquerque regarding use of public rights-of-way, reuse/reinjection of produced water, and the difficulty of obtaining necessary permits. Also need to update institutional control issues.

15 days

Task 4. Need to generate quantitative information on deep soil gas constituent concentrations (above the water table) to respond to EPA request for expanded soil gas/soil treatment information. In addition, this information is needed to resolve constituent "source" and vadose zone transport issues raised by EPA.

at Sparton

*0 30 days
what "issues"?*

Task 5. Design (re-design) various site-specific corrective measure alternatives including additional extraction, treatment, and disposal methodologies. Design to be based on latest available information.

GWB-00520-SPARTON

CMS REVISION SCHEDULE
SPARTON TECHNOLOGY
COORS ROAD FACILITY
ALBUQUERQUE, NEW MEXICO

Task Elements	March 14	March 15	March 16	March 17	March 18	March 19	March 20	March 21	March 22	March 23	March 24	March 25	March 26	March 27	March 28	March 29	March 30	March 31	
TASK 1																			
TASK 2																			
TASK 3																			
TASK 4																			
TASK 5																			
TASK 6																			
TASK 7																			
TASK 8																			
TASK 9																			
TASK 10																			