



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733



March 29, 1996

VIA FACSIMILE AT (505) 892-5515 AND
CERTIFIED MAIL-RETURN RECEIPT REQUESTED Z 698 454 971

Mr. Richard D. Mico
Sparton Technology, Inc.
Vice President and General Manager
4901 Rockaway Blvd., SE
Rio Rancho, New Mexico 87124

Dear Mr. Mico:

This letter is in response to your March 25, 1996, letter in which Sparton Technology, Inc. (Sparton) requested a sixty (60) day extension for the submission of a final Corrective Measures Study (CMS) Report. EPA has also reviewed the memorandum from Pierce Chandler, dated March 20, 1996, outlining the approach and time line for completion of the final CMS Report. A review of the ten tasks cited in Mr. Chandler's memorandum indicates that Sparton is performing tasks beyond what EPA required in its CMS comments, and that Sparton has overestimated the time needed to accomplish certain tasks. Because of the general nature of Sparton's response, in some cases it is difficult to determine which CMS comment Sparton is responding to in each task.

- Task 1: EPA believes that this process has been ongoing since suspension of the public participation process in September 1995. These issues have also been addressed in previous letters by EPA and Sparton.
- Task 2: Sparton appears to be discussing both corrective measure alternatives and treatment technologies as part of this research. EPA is not expecting Sparton to provide new research information for the corrective measure alternatives in the CMS Report.

For the two new treatment technologies (ion exchange and chemical precipitation), EPA is expecting a level of effort consistent with a handbook approach concerning applicability of the technology. The title of an applicable reference has been provided for each of the two new treatment technologies.

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- Task 3: The 60-day time frame appears excessive. The City of Albuquerque, County of Bernalillo, and New Mexico Environment Department have indicated their willingness to work with Sparton to expedite the evaluation process.
- Task 4: EPA is not expecting Sparton to perform soil gas sampling as a task of the CMS Report.
- Task 5: EPA is expecting Sparton to provide the supporting documentation used to estimate the scope of an alternative (e.g., derivation for number of soil vapor extraction wells) presented in the draft CMS Report. EPA is not expecting Sparton to provide design drawings (e.g., geotechnical, electrical, etc.) for each of the corrective measure alternatives. EPA is also not requesting Sparton to evaluate additional extraction alternatives. EPA has previously asked Sparton to evaluate alternative disposal methodologies.
- Task 6: For the two new treatment technologies (ion exchange and chemical precipitation), EPA is expecting a level of effort consistent with a handbook approach concerning applicability of the technology. The title of an applicable reference has been provided for each of the two new treatment technologies. A further evaluation of catalytic oxidation would be provided by Sparton only if the technology is found to be appropriate for the site. EPA is not requesting that Sparton re-design the treatment technologies currently provided in the CMS Report.
- Task 7: This time frame appears excessive since EPA's letter of February 20, 1996, was received by Sparton on February 23, 1996;
- Task 8: For certain corrective measure alternatives, EPA is requesting that Sparton provide the supporting documentation for general cost estimates in the CMS Report. Sparton should not have to develop new detailed cost information for these alternatives. The exception is the no further action alternative, which will include the added costs of future monitoring wells.

For the treatment technologies, EPA is requesting that Sparton provide cost estimates for ion exchange and chemical precipitation. A similar cost estimate for catalytic oxidation would be provided by Sparton if the technology is found to

be appropriate for the site. For these treatment technologies, EPA is expecting a level of effort for cost estimations that is consistent with a handbook approach to determining costs. References were provided for each of the two new treatment technologies.

Task 9: In development of the corrective measure alternatives, Sparton should have already completed the process for short-range and long-range projections of corrective measure achievement. EPA is simply requesting that Sparton provide the supporting documentation for Sparton's previous statements concerning expected results. EPA did not intend that Sparton redevelop short-range and long-range projections for corrective measure achievement.

Task 10: EPA recognizes that Sparton may need time for completing the final CMS Report. Based on EPA's previous comments, Sparton should be able to initiate preparation of the final CMS Report earlier in the time line.

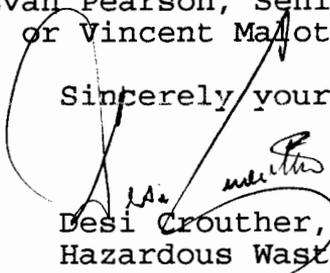
After consideration of the available information, EPA is granting an extension until May 6, 1996, to submit the final CMS Report. EPA remains committed to taking the necessary steps to achieve an expeditious determination of the appropriate remedy at the Sparton facility. As stated in previous correspondence and at the meeting on March 13, 1996, EPA is willing to work closely with Sparton to expedite the completion of the final CMS Report. To further exemplify our commitment to this effort:

- (1) Vincent Malott of my staff is available for meetings and conference calls, at Sparton's convenience, to further discuss EPA's comments, the ten (10) tasks set forth in Mr. Chandler's March 20, 1996, memorandum, other technical issues of a concern to Sparton or its representative(s), and any and all options for streamlining the aforementioned tasks (thus, reducing transactional costs between EPA, Sparton, and its representatives);
- (2) EPA remains committed to working closely with all stakeholders involved in, or affected by, this matter. The City of Albuquerque, County of Bernalillo, and the New Mexico Environment Department have also expressed their willingness to facilitate this process as previously stated in their public comment submittals. As necessary, EPA will help facilitate future meetings with City, County, and State agencies to expedite the completion of the final CMS Report; and

- (3) I am also willing to engage in periodic conference calls and/or meetings with you (or your designee) to provide any further clarification concerning the CMS comments, to obtain Sparton's progress in addressing said comments, and to discuss any related impediments. I will be contacting you on April 2, 1996, to initiate these discussions.

EPA is looking forward to working with Sparton to address the site as expeditiously as possible. If you have any questions, please contact Evan Pearson, Senior Enforcement Counsel, at (214) 665-8074, or Vincent Mallott at (214) 665-8313.

Sincerely yours,


Desi Crouther, Chief
Hazardous Waste Enforcement Branch

cc: Mr. James Harris, Thompson & Knight
Mr. Jan Appel, Sparton Corporation
Mr. Ron Kern, HRMB, New Mexico Environment Department
Mr. Dennis McQuillan, GWPRB, New Mexico Environment Dept.
Mr. Norman Gaume, Albuquerque Public Works Department
Mr. Kurt Montman, Albuquerque Environmental Health Dept.
Mr. Steve Cary, New Mexico Office of Natural Resources
Trustee