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**ENVIRONMENT DEPARTMENT**  
Ground Water Protection and Remediation Bureau

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DEPUTY SECRETARY

May 10, 1996

Mr. R. Jan Appel  
Sparton Technology, Inc.  
2400 E. Ganson St.  
Jackson, MI 49202

RE: Source Area Investigation, Sparton Technology, Inc. (Sparton),  
Coors Road Facility, Albuquerque, NM

Dear Mr. Appel:

During our settlement meeting on April 25, 1996, Sparton requested that the New Mexico Environment Department (NMED) furnish the following information regarding a source investigation of the source area at Sparton's Coors Boulevard facility:

- 1) An area for the installation of nested vapor probes;
- 2) Technical specifications for the construction of the nested vapor probes;
- 3) Approval of the above by the various public agencies involved with this situation.

The following shall address these issues:

- 1) If Sparton decides to proceed with a phased voluntary approach to a comprehensive source investigation, a logical beginning would be the installation of a minimum of 4 nested vapor probes in and around the source area. A map showing these locations is attached. Drill cuttings and core samples should be collected during drilling to prepare a lithologic log of each boring. Core samples should be collected from each interval where a vapor screen will be installed and analyzed as solid-matrix samples in a laboratory.
- 2) Specifications for vapor probe construction and sampling also are attached. In each nest, a probe should be installed approximately every 10 vertical feet. The exact depth of each vapor probe may be varied based on the lithology encountered in each hole. The probes should be installed in the coarsest-grained materials encountered in each 10 foot interval. Vapor samples should be analyzed for aromatic and halogenated volatile organic compounds (VOCs). Soil samples should be

analyzed for VOCs and chromium.

- 3) The U.S. Environmental Protection Agency (EPA), the New Mexico Office of the Natural Resources Trustee, the City of Albuquerque and Bernalillo County agree with the technical specifications described in items 1 and 2 above. Additional investigation may be required by NMED depending upon what is found in the 4 initial vapor-probe nests. Furthermore, EPA will be selecting a remedy for the site in the near future. Depending on the remedy that is selected, EPA may require Sparton to conduct a more comprehensive vadose-zone investigation which would be implemented as part of EPA's corrective action process, and not as part of a voluntary approach.

The NMED Hazardous and Radioactive Materials Bureau investigated the possibility of penetration of the RCRA cap that is currently in place over the source area. They determined the approved RCRA Closure Plan includes language to allow additional borings through the cap. The existing Closure Plan acknowledges that future penetrations of the cap may occur. Therefore, the proposed cap penetration will be made an addendum to the RCRA Closure Plan and given a 30 day public comment period. Approval of the Closure Plan addendum will be based on public comments. The concrete plug at the top of the vapor-probe nest (shown on the attached schematic) must be at least as thick as the RCRA cap to prevent the penetration from creating a migration pathway through the cap.

Sparton must give NMED at least 4 working days advance notice, in writing, of any vapor-probe construction and sampling, so that these actions can be overseen. We also request such notice for any other environmental investigative or corrective actions at the site. Upon such notice, NMED will notify the other government parties.

Section 74-6-9.D of the New Mexico Water Quality Act requires that NMED, "make every reasonable effort to obtain voluntary cooperation in the prevention or abatement of water pollution." NMED requests that Sparton commit, in writing by May 24, 1996, to perform a voluntary phased approach for its soil-vapor investigation. If we do not receive Sparton's commitment by May 24, 1996, we will assume that Sparton refuses to voluntarily conduct a phased source investigation as set forth in this letter. If so, NMED will review its options under state and federal law for an appropriate course of action.

NMED is working with the other parties to develop the next phase of ground-water monitoring well locations, completion details, and

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ground-water investigation completion criteria as we discussed at our meeting. This information will be provided to Sparton under separate cover. Sparton needs to understand that present negotiations with NMED under state law are parallel to and complement the ongoing administrative process currently being conducted by EPA; however, these discussions are part of a separate process, both administratively and legally.

Notwithstanding the fact that the monitor well details will be forthcoming, there appears no reason to delay proceeding with the much needed soil-vapor investigation as described above.

For the sake of expediency, Ana Marie Ortiz has authorized me to send this letter directly to you. All future communication with you and Jim Harris, however, must go through her.

Sparton's cooperation and timely action on this matter will be greatly appreciated.

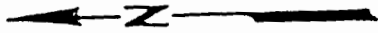
Sincerely,



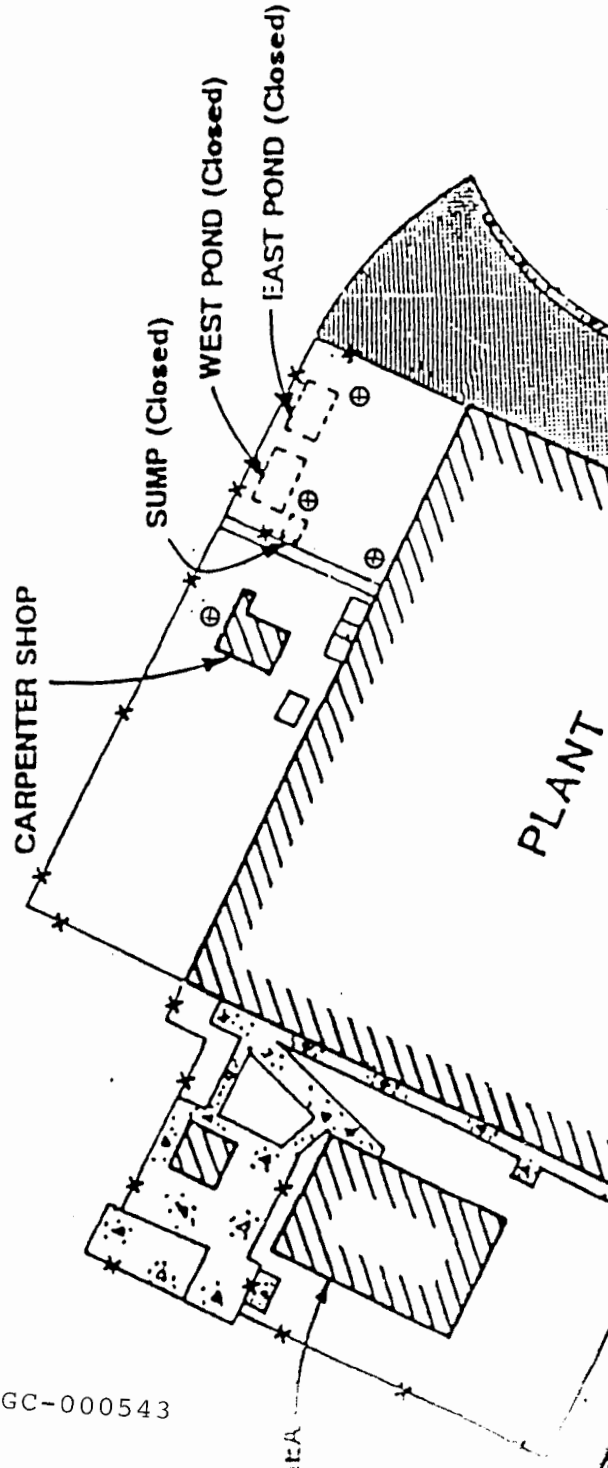
Dennis McQuillan,  
Remediation Manager  
Ground Water Quality Bureau

enclosures

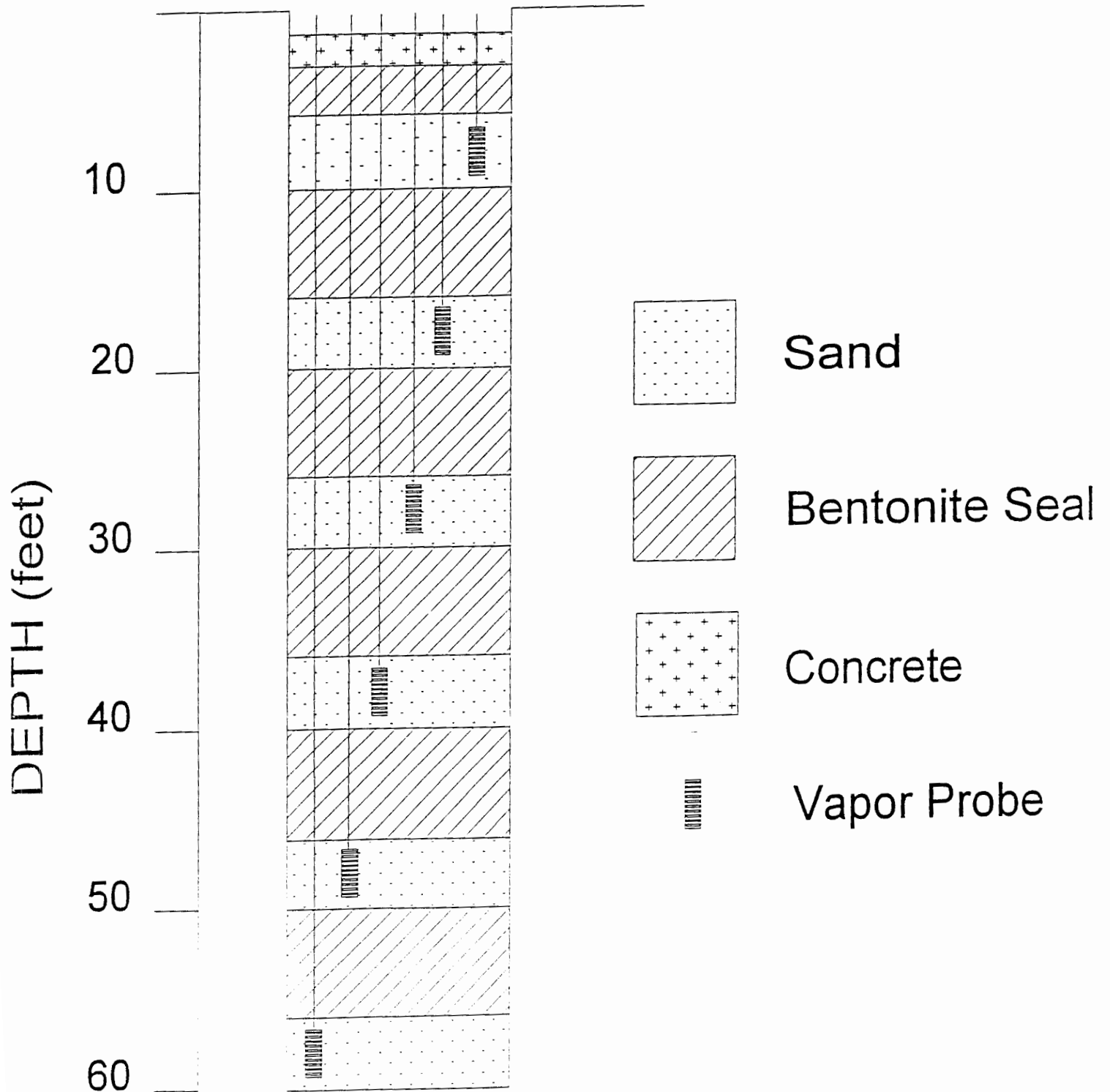
xc Mark Weidler, NMED Secretary  
Ed Kelley, Director, Water and Waste Management Division  
Richard Mertz, Chief Counsel  
Ana Marie Ortiz, Office of General Counsel  
Benito Garcia, Hazardous and Radioactive Materials Bureau  
Ron Kern, Hazardous and Radioactive Materials Bureau  
Steve Cary, Office of the Natural Resources Trustee  
Vincent Malott, EPA  
Evan Pearson, EPA  
Norman Gaume, Albuquerque Public Works  
Curt Montman, Albuquerque Environmental Health  
Gary O'Dea, Albuquerque City Attorney's Office  
Richard Brusuelas, Bernalillo County Environmental Health  
Pierce Chandler, Black and Veatch  
Jim Harris, Thompson and Knight  
Gary Richardson, Metric Corporation



⊕ Vapor Probe Nest



# VAPOR PROBE NEST



## VAPOR PROBE CONSTRUCTION

- Screen:** Constructed of a 12" to 18" length of 1/2" or 1" diameter 10-slot PVC screen. The screen should be capped on one end. On the other end should be a fitting which slips over the screen and has 3/4" internal threads on the other end. A brass fitting with 3/4" treads on one end and 1/4" compression union on the other end should be threaded into the fitting at the end of the screen. In no case should PVC cement be used.
- Riser Tube:** 1/4" diameter copper tube that has been decontaminated (as is used for ice makers). The tubing is connected at one end to the compression union at the end of the screen. The screen is then lowered down into the hole as the tubing is uncoiled. The copper tubing should be marked with the depth and capped at the surface.
- Filter Pack:** The volume surrounding the screen should be filled with a 12/20 silica sand. The sand should extend at least one foot above and below the screen.
- Seal:** Between each screen/sand interval should be a low permeability seal. This seal should have a high bentonite content and a lower permeability than the surrounding formation. The material should be dry. If the interval of the seal is large, the middle portion can contain a higher permeability sand/bentonite mixture. However, each low permeability layer should be at least one foot thick.
- Sampling:** A vacuum is applied to the end of each riser tube for a period long enough to remove a volume of air equal to at least three times the volume of the riser tube plus three times the volume of sand pack surrounding the vapor probe. A PID should be used to monitor the purged air. The PID values should be recorded. After purging is complete, an air sample should be collected in a Tedlar bag. Care should be taken to minimize any atmospheric air that may enter the Tedlar bag.