

State of New Mexico ENVIRONMENT DEPARTMENT Ground Water Protection and Remediation Bureau Harold Runnels Building 1190 St. Francis Drive, P.O. Box 26110

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GARY E. JOHNSON GOVERNOR

July 17, 1996

Pierce L. Chandler, Jr. Black & Veatch 5728 LBJ Freeway Suite 300 Dallas, TX 75240

FILE COPY

RE: Soil Vapor and Ground Water Extraction at Sparton's Coors Road Facility

Dear Mr. Chandler:

On Monday, July 15, 1996, you, Rob Pine of the New Mexico Environment Department (NMED) and I had a phone conversation regarding the letter dated July 10, 1996 that you sent to Jan Appel of Sparton Technology, Inc. (Sparton) containing, in part, Sparton's Soil Vapor Extraction (SVE) proposal. This letter serves to memorialize that conversation. During the phone conversation, NMED expressed its concerns and disapproval for the proposals as set out in your July 10 letter and you agreed to resubmit the proposal pursuant to our telephone discussions.

Regarding the SVE proposal, it was made clear during our telephone conversation that NMED will require a pilot study in the source area in order to facilitate the design of the most effective system possible. Such a study will, in all likelihood, serve to minimize costs in the long term. You agreed to this and to resubmitting a proposal for the SVE system that includes pilot testing. It was also agreed that the extraction well used in the pilot test would be installed so that the existing vapor probe nest, VP-1, is the closest monitoring point to aid in the detection of short circuiting from the use of a fully screened extraction well.

Also discussed was the plume containment portion of your letter. Skepticism was expressed on the part of NMED in the ability to contain the entire plume through the use of one extraction well pumping from 50 to 100 gallons per minute. A lack of trust in the use of infinite-capture zone calculations was expressed and was decided that NMED will do additional review of the existing data and submit more comprehensive comments on this proposal under separate cover. It was my understanding that Sparton will not proceed with this portion of the proposal at this time.

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Finally, the disposal of treated water was discussed. The difficulty and time required to obtain a NPDES permit was conveyed. We expressed our preference for reinjection under a discharge permit due to the relative ease involved in obtaining one for this sort of discharge. We have offered to meet with Chuck Dumars and other Sparton representatives along with appropriate NMED managers to discuss this matter. Further discussion needs to occur before NMED can agree to this option proposed by Sparton.

If you would like to discuss any of these matters further, please call me at 505-827-2831 or Rob Pine at 505-827-0178.

Sincerely, Denn's McGuillan

Dennis McQuillan Program Manager Assessment & Abatement Section

cc: Ana Marie Ortiz, OGC Vincent Malott, EPA Evan Pearson, EPA Norman Gaume, Albuquerque Public Works Jan Appel, Sparton Technology, Inc. Jim Harris, Thompson & Knight