



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502

OFFICE OF GENERAL COUNSEL

PHONE: 505-827-2990

FAX: 505-827-1628

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

August 29, 1996

Mr. Jim Harris
1700 Pacific Avenue
Suite 3300
Dallas, Texas, 74201-4693

Dear Jim:

This letter will serve to address the deficiencies of Sparton's most recent proposal of August 12, 1996. Although we have not approved any of Sparton's proposals we feel progress has been made toward an acceptable plan for the soil vapor extraction pilot test.

A major concern with each proposal Sparton has submitted to the New Mexico Environment Department (NMED) is that it is submitted in bits and pieces and incomplete. NMED cannot evaluate a proposal in a piecemeal fashion.

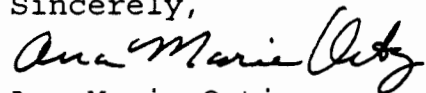
In Sparton's most recent proposal it attempts to address how it will conduct a pilot test. Unfortunately, the proposal merely provides locations for five observation and recovery wells. The proposal does not provide the necessary technical details on the pilot test procedures such as vacuum levels, vapor sampling frequency, test duration and justifications. Before NMED can approve the pilot test portion of Sparton's proposal NMED needs to view the locations in context with the other technical components of the pilot test.

Another major problem concerning the recent proposal is that it fails to contain sufficient information and technical detail as to how Sparton proposes to further characterize the extent of soil vapor contamination which may not be adequately delineated by the five proposed wells. The only part of Sparton's proposal that addresses how it plans to technically characterize the extent of soil contamination is its statement that "The additional vapor wells would also be used to further define the extent of the VOC concentration in the soil gas." Knowledge of the extent of soil contamination, in addition to the results of the pilot test, is necessary for the proper design of a soil vapor extraction system which will need to be submitted once Sparton's pilot test and characterization are complete.

A contingency plan also needs to be included in Sparton's proposal to contend with the possibility that the proposed distribution of wells for the pilot test will not be adequate to obtain the necessary information from the test.

NMED remains hopeful that Sparton will submit a complete proposal and continue to make progress toward the installation of a soil vapor extraction system. If Sparton desires to resubmit a proposal which addresses the deficiencies set forth in this letter and previous letters, Sparton needs to let NMED know before September 6, 1996.

Sincerely,


Ana Marie Ortiz

cc: Mark E. Weidler, Secretary
Ed Kelley, Director
Dennis McQuillan
Rob Pine ✓
Evan Pearson, EPA
Gary O'Dea, City of Albuquerque
Charlie de Saillan, ONRT
David Fishel, DOJ
David Hokenbrocht, President, Sparton
Pierce Chandler, Black and Veatch