SPARTON

SPARTON TECHNOLOGY

April 13, 1998

Mr. Benito Garcia
Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
PO Box 26110
Santa Fe, New Mexico 87505

Re: Second Quarter 1998 Ground Water Sampling Event

Dear Mr. Garcia:

This letter is to inform you that Sparton Technology, Inc. will start groundwater sampling for the 2nd Quarter, 1998 on April 20, 1998. Sampling should conclude on, or about April 24. SGMP wells, MW-32, 36, 37, 42, 43, 46, 48, 51, 52, 53, 55, 56, 57, 58, 60, 61, 62, 64, 65, 66, 67, 68, 69 and 70 are slated for Method 8240 analysis. AGMP wells MW-9, 14, 15, 16, 19, 20, 21, and 22 are to be sampled for Method 8010, pH, specific conductance, TOC and TOX.

If you have any questions please contact John Wakefield or myself at (505) 892-5300. Thank you for your attention to this matter.

Sincerely,
SPARTON TECHNOLOGY, INC.

Richard D. Mico
Vice President and General Manager

cc: Mr. J. Appel
Mr. P. Chandler
Mr. J. Harris: Thompson & Knight
Mr. M. Hebert: EPA Region VI
Mr. P. Metzner: Metric Corp.
Mr. D. MacQuillan: NMED-GWQB
Mr. J. Wakefield

Stu

FACSIMILE from

SPARTON TECHNOLOGY, INC.
subsidiary of SPARTON CORPORATION
An ISO 9001 registered company
4901 Rockaway Blvd. • Rio Rancho, NM 87124 • (505) 892-5300 • FAX (505) 892-5515

Date: 4-13-98

Number of pages including this page: 2

TO: Mr. Benito Garcia
Mr. Carl Will
cc: Mr. Michael Hebert
at 214-665-7446

PHONE: 505-827-1558
FAX PHONE: 505-827-1544

SUBJECT: Ground Water Sampling

FROM: John Wakefield

Sparton Technology, Inc.
PHONE: 505-892-5300
FAX PHONE: 505-892-5515

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1993

April 13, 1998

Mr. Benito Garcia
Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
PO Box 26110
Santa Fe, New Mexico 87505

Re: Second Quarter 1998 Ground Water Sampling Event

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If you have any questions please contact John Wakefield or myself at (505) 892-5300. Thank you for your attention to this matter.

Sincerely,
SPARTON TECHNOLOGY, INC.

Richard D. Mico
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cc: Mr. J. Appel
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Mr. D. MacQuillan: NMED-GWQB
Mr. J. Wakefield

STATE OF NEW MEXICO

DEPARTMENT OF HEALTH

SCIENTIFIC LABORATORY DIVISION

P.O Box 4700
Albuquerque, NM 87196-4700
AIR & HEAVY METALS SECTION

700 Camino de Salud, NE
(505)-841-2500
(505)-841-2553

SAMPLE COLLECTION: DATE: 2/19/98 TIME: 1220
MATRIX: wpn BY: Les
SAMPLING LOCATION: MW25 Sparton Tech Coors Blvd Rio Rancho

SLD No.: HM-9800230
REQUEST ID No.: 198631
RECEIVED AT SLD: 2/19/98
USER: 55840
SUBMITTER: 533
WSS #: 0

To: Submitter

Carl Will
NMED Hazardous and Radioactive Materials Bureau
P.O. Box 26110
2044 Galisteo
Santa Fe, NM 87502

DISTRIBUTION TO:
Submitter
SLD Files

Practical Quantitation Limit (PQL) is defined as 10 times the Method Detection Limit (MDL)

ANALYTICAL RESULTS

Element	Result	Units	Analysis Date	Method	PQL	Dilution Factor	Sample Det. Limit.	Analyst	Data Qualifier
Arsenic	0.058	mg/L	3/19/98	206.2	0.005	1	0.005	JM	C I
Barium	0.6	mg/L	3/17/98	200.8	0.1	2	0.2	SP	H
Cadmium	0.006	mg/L	3/17/98	200.8	0.001	1	0.001	SP	C H
Chromium	8.1	mg/L	3/25/98	218.1	0.1	5	0.5	RS	I
Lead	0.034	mg/L	3/17/98	200.8	0.001	1	0.001	SP	C H
Mercury	<0.0002	mg/L	2/27/98	245.1	0.0002	1	0.0002	KF	
Selenium	<0.005	mg/L	3/10/98	270.2	0.005	1	0.005	JM	
Silver	<0.001	mg/L	3/17/98	200.8	0.001	1	0.001	SP	C H

Laboratory Comments:
Sample digested using SLD Method 41414.

Reviewed by: Ron Amato
Supervisor, Air & Heavy Metals Section
Printed: 3/31/98

RHE

Data Qualifier Codes and Definitions

A = Insufficient sample for analysis
B = Laboratory Reagent Blank (RB)
C = Spike recovery between 80-120%
D = Spike recovery <80% or >120%
E = Over Calibration Range
F = Matrix interference suspected
G = Inconsistent results; suggest re-sampling
H = Analyzed in duplicate
I = Analyzed in Triplicate
J = Estimated Quantity, only.
K = Holding time exceeded
L = Equals or exceeds USEPA MCL
M = Equals or exceeds USEPA Action Level
N = Insufficient sample to verify results
O = Internal Standards(ICP/MS) <60% or >125% when sample analyzed straight
R = The data are unusable
T = Total Metals
TR = Total Recoverable Metals
U = Not detected above the PQL or SDL.
UJ = Not detected. Estimated value, only.

GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Ground Water Quality Bureau
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2918 phone
(505) 827-2965 fax

MARK E. WEIDLER
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 24, 1998

Mr. Richard D. Mico, V.P. & General Manager
Sparton Technology, Inc.
4901 Rockaway Boulevard SE
Rio Rancho, New Mexico 87124-4469

RE: Response to Submittal of Additional Information, DP-1184, Sparton Technology, Inc. - Coors Road Facility.

Dear Mr. Mico:

The New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB), Pollution Prevention Section (PPS) has reviewed Sparton Technology, Inc's. response to additional information dated March 20 and March 23, 1998. NMED/GWQB requested additional information from Sparton Technology, Inc. (Sparton) on March 16, 1998, in order to proceed with the discharge plan process for the Sparton - Coors Road Facility (DP-1184) ground water remediation system. The proposed discharge location is located northwest of Albuquerque, in projected Section 7, T11N, R3E, Bernalillo County. It is NMED's understanding from discussion with Gary Richardson that Sparton is pursuing the Alternate 2 (Calabacillas arroyo site) discharge location, therefore the following comments pertain only to the Alternate 2 discharge location.

1. NMED is aware that Sparton is currently in the process of negotiating with the fee owner of the land (Ron Brown) at the proposed Alternate 2 discharge location (Calabacillas arroyo site) and Sparton has committed to provide a signed lease agreement to NMED as soon as possible. Sparton must submit a signed lease agreement to NMED before the discharge plan can be approved in accordance with WQCC Regulation 3109.B. Upon receipt of a signed lease agreement, NMED will issue the discharge plan within 2 weeks.

2. The information submitted by Sparton regarding the expansion of the infiltration gallery, the monitoring plan, product information, the contingency plan, and the closure plan satisfies NMED's request for additional information in accordance with WQCC Regulation 3107.

The public comment period for the DP-1184 will end on March 25, 1998. If there are no public comments received and there is no significant public interest to warrant a public hearing, NMED will continue to process the discharge plan application in accordance with New Mexico Water Quality Control Commission Regulations for the Alternate 2 location.

Thank you for your prompt response to NMED's request for information. If you have any questions pertaining to the discharge plan application or the discharge plan approval process, please feel free to contact me at (505) 827-0652.

Sincerely,

Victoria Maranville
Geologist
Ground Water Pollution Prevention Section

xc: Dennis McQuillan, NMED/GWQB
Ana Marie Ortiz, Assistant General Counsel, NMED Office of General Counsel
Gary Richardson, P.E., METRIC Corporation, 8429 Washington Place NE., Albuquerque, NM 87113

SPARTON

SPARTON TECHNOLOGY

March 23, 1998

Victoria Maranville
Groundwater Quality Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

Re: DP-1184 March 20, 1998 letter to Victoria Maranville

Dear Ms. Maranville:

In response to your conversation earlier today with our consultant, Gary Richardson, we wish to revise the last paragraph of our response to Comment 4 of your letter dated March 16, 1998 to read as follows:

> In addition to the airstripper effluent monitoring proposed in the Discharge Permit Application Form Item 18., Sparton will analyze for iron and manganese on a weekly basis for the first month, and monthly thereafter.

If you have any additional questions or comments, please contact us as soon as possible.

Sincerely,

SPARTON TECHNOLOGY, INC.

Richard D. Mico
Vice President and General Manager

SPARTON

SPARTON TECHNOLOGY

March 20, 1998

Ms. Victoria Maranville
Groundwater Quality Bureau
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

Re: DP-1184 Status

Dear Ms. Maranville:

Sparton Technology, Inc. (Sparton) is providing the following responses to your request for additional information dated march 16, 1998. As you suggested, we are providing the information in the form of this letter rather than revising the discharge plan. It is our understanding that you will incorporate this letter into the discharge plan approval.

Each of the seven items requested in your letter of March 16, 1998 are repeated in italics, and Sparton's response is presented below the request.

NMED Comment

1. *Three alternate discharge sites are proposed in the discharge plan application. However, signed copies of lease agreements between land owners and Sparton were not included for any of the sites. NMED recognizes that Sparton is in the process of negotiating with land owners prior to choosing a discharge location or locations. In order for the administrative record to be complete, Sparton must submit signed lease agreements to NMED before the discharge plan can be approved in accordance with WQCC Regulation 3109.B.*

   Please submit the signed lease agreement(s) to NMED as soon as possible.

Sparton Response

1. Sparton is presently negotiating with the fee owner of the land (Ron Brown) at the Alternate 2 discharge point which is located in the Calabacillas Arroyo. We will transmit the Access Agreement to you at the earliest possible date.

NMED Comment

2. *The containment well is estimated to produce up to approximately 600 gallons per minute (gpm). Sparton requested a permit to discharge up to 600 gpm,*

however the infiltration gallery is designed for 200 gpm. If in order to contain the contaminant plume, Sparton needs to discharge greater than 200 gpm to the infiltration gallery, the infiltration gallery will need to be expanded.

Sparton may submit a design for a phased construction to accommodate flows up to 600 gpm at this time or, prior to discharging greater than 200 gpm to the infiltration gallery, Sparton will need to submit revised plans and specifications for NMED approval for the expansion of the infiltration basin.

Sparton Response

2. As stated in the last paragraph of Item 16. of the Discharge Plan Application Form, "If the actual system capacity is more or less than 200 gpm, the gallery size will be increased or decreased proportionally." If the infiltration gallery must be sized for more than 200 gpm, Sparton will submit revised plans and specifications for NMED approval prior to discharging more than 200 gpm.

NMED Comment

3. *One monitor well per alternate discharge location is proposed by Sparton. NMED will require more than one monitor well per discharge location to monitor groundwater quality and determine gradient in the vicinity of the proposed infiltration gallery. In addition, the proposed monitor well associated with Alternate 2 discharge location is located approximately 500 feet down gradient of the proposed infiltration gallery within the Calabacillas Arroyo. NMED believes the proposed Alternate 2 monitor well is located too far from the infiltration gallery for timely detection of potential groundwater contamination from the infiltration gallery. The down gradient monitor well must be located within 50 feet of the proposed infiltration gallery to detect potential groundwater contamination as a result of your discharge. Where applicable, NMED will consider use of other properly completed wells in the near vicinity of the discharge locations for the determination of groundwater gradient.*

In accordance with WQCC Regulation 3107.A., please submit a revised monitoring plan which includes the following: installation of three monitor wells for each discharge location, two monitor wells must be located down gradient of the proposed infiltration gallery, and one up gradient to monitor groundwater quality in the vicinity of the proposed infiltration gallery. All monitor wells must be triangulated and surveyed to common permanent bench mark to the nearest one-hundredth of a foot; located within 50 feet of the proposed infiltration gallery; and installed in accordance with NMED Guidelines for Monitor Well Construction and Abandonment (copy enclosed). In addition, please include in your amended submittal a commitment and procedure for plugging, abandoning, and replacing the monitor wells in the event that they are damaged by flooding in the arroyo.

Sparton Response

3. With respect to Alternate 2, and based on the site visit yesterday involving Gary Richardson and yourself, Sparton will construct three new monitoring wells near the infiltration gallery as follows:

    - One down gradient monitoring well located within 50 feet of the infiltration gallery.
    - One down gradient monitoring well located within 150 feet of the infiltration gallery.
    - One up gradient monitoring well located within 250 feet of the infiltration gallery.

    Sparton will survey the locations of the three new monitoring wells, and Sparton will survey the measuring point elevations of the new monitoring wells to the nearest one-hundredth of a foot as related to a common permanent bench mark.

    Sparton will construct and abandon the proposed monitoring wells in accordance with "NMED Guidelines for Monitor Well Construction and Abandonment". As indicated in the second paragraph of Item 9. of the Discharge Permit Application Form, the monitoring wells will be screened from about 10 feet above the water table to about 20 feet below the water table.

    If any of the proposed monitoring wells are damaged by the flooding arroyo, Sparton will repair or rebuild the wells as necessary.

NMED Comment

4. *The monitoring plan submitted to NMED proposes quarterly groundwater monitoring for two years and semi-annually thereafter. Quarterly groundwater monitoring for all monitor wells surrounding the infiltration basin will be required. Groundwater monitor wells shall be sampled and analyzed prior to discharge and on a quarterly basis for the duration of the discharge permit for chlorinated solvents, and iron and manganese using EPA approved methods. NMED will consider a request for a reduction in monitoring after two (2) years for the following: 1) a reduction in monitoring frequency for up gradient wells, and 2) a reduction in monitoring frequency if no iron and manganese is detected above WQCC standards. A minimum of one down gradient well will need to be continued to be monitored quarterly for the duration of the discharge.*

    The monitoring plan proposes effluent monitoring from the air stripper on a daily basis for the first week following start-up, weekly for the first month, and monthly thereafter for chlorinated solvents. In addition to the chlorinated solvents, iron and manganese will be required to be monitored on a weekly basis for the first month of operation and a monthly basis thereafter.

In accordance with WQCC Regulation 3107.A., please incorporate the above-referenced changes into your revised monitoring plan.

Sparton Response

4. Sparton will monitor the monitoring wells associated with the infiltration gallery on a quarterly basis for two years. The samples will be analyzed for chlorinated solvents (TCE, 1,1,1-TCA, 1,1-DCE, and methylene chloride) using EPA Method 8021 HALO (formerly EPA Method 8010), and for chromium, iron and manganese using EPA Method 6010.

   Sparton may request a reduction in monitoring frequency in the up gradient well and one down gradient well after two years.

   Sparton will continue to monitor one down gradient monitoring well on a quarterly basis.

   In addition to the airstripper effluent monitoring proposed in the Discharge Permit Application Form Item 18., Sparton will analyze for iron and manganese on a weekly basis for the first month.

NMED Comment

5. *Aqua Mag is proposed to be added to the treated effluent prior to discharge to the infiltration gallery to prevent clogging and scale due to mineralization. Product information and concentrations of constituents to be injected are required for Aqua Mag.*

   In accordance with 3106.B., please submit detailed product information for Aqua Mag to NMED.

Sparton Response

5. As discussed in the third paragraph of Attachment E (Operation Plan) to our Groundwater Discharge Permit Application, Aqua Mag consists of 30% ortho phosphate and 70% poly phosphate. Additional Aqua mag product information is attached to this letter. We anticipate adding Aqua mag to the pumped water at a rate of about 4 ppm.

NMED Comment

6. *The contingency plan submitted for the alternate discharge locations does not address measures to be taken in the event that groundwater is contaminated, the infiltration gallery fails, or there is surfacing of treated effluent in the vicinity of the proposed infiltration gallery as a result of Sparton's discharge.*

In accordance with WQCC Regulation 3107.A., please submit a revised contingency plan to NMED outlining measures to be taken in the event that groundwater in the vicinity of the infiltration gallery is contaminated as a result of your discharge and measures to be taken in the event there is surfacing effluent.

Sparton Response

6. If discharge to the proposed infiltration gallery contaminates the groundwater at the discharge point, Sparton will abate any pollution of the subsurface water in accordance with Subpart IV of the New Mexico Water Quality Control Commission Regulations.

   As discussed in the second paragraph of Item 17. of the Discharge Permit Application Form, the piezometer in the infiltration gallery will be equipped with a high level shut down which will turn off the containment well pump if the water level in the infiltration gallery rises to the top of the gravel in the gallery. At this point the water level in the gallery is seven feet below the arroyo bed. This will prevent surface discharge of treated groundwater.

   Sparton will either have the containment well system checked by an operator twice per week or install an automatic alarm to notify a responsible party, to assure that the system is not shut down for an extended period of time.

   If the infiltration galley clogs, based on an estimate from a local contractor, Sparton believes that the gallery can be replaced at the same location within 6 weeks.

NMED Comment

7. *The closure plan for the proposed infiltration gallery allows for the plugging and abandonment of the infiltration gallery in place. NMED believes that it is acceptable to plug and abandon Alternate 1 site in place (dedicated park site) and Alternate 3 (City of Albuquerque storm water site). However, NMED does not believe plugging and abandoning in place to be an appropriate method of closure for the arroyo site (Alternate 2). Equipment in the arroyo must be removed following post closure monitoring in order to prevent the disposal of refuse in a watercourse as required by WQCC Regulation 2201.*

   In accordance with WQCC Regulation 3107.A., please submit a revised closure plan for the Alternate 2 discharge location to include removal of the infiltration gallery equipment following the period of post closure monitoring and prior to final termination of the discharge plan.

Sparton Response

7. For Alternate 2, Sparton will remove the perforated pipe from the infiltration gallery as part of the closure activities.

If you have any additional questions or comments, please contact us as soon as possible.

Sincerely,

Richard D. Mico
Vice President and General Manager

RDM/rkh

The Kjell Corporation
P.O. Box 834
Beloit, WI 53512
Phone: 800-356-0422
Fax: 608-755-0538

THE KJELL CORPORATION

Kjell Laboratories
5043 Hwy 51 South
Janesville, WI 53546
Phone: 608-755-0422
Fax: 608-755-1339

AQUA MAG

SEQUESTRANT, SCALE, AND CORROSION INHIBITOR

Aqua Mag is a water treatment additive for potable and industrial water treatment. It is produced by thermal reaction of food-grade phosphates into a liquid concentrate of exceptional purity, clarity, and stability. Aqua Mag contains all available species of phosphate compounds, for better sequestration and corrosion control.

SEQUESTRATION	**CORROSION CONTROL**
Reduction of: * *Iron and Manganese stains* * *Calcium deposits* * *Chlorine demand*	*Reduction of:* * *Lead and Copper leaching* * *Iron tuberculation in distribution pipes* * *Microbial Influenced Corrosion (MIC)*
CERTIFICATIONS	*USEPA, USDA, NSF International, UL, ANSI/NSF Std. 60 and Kosher approved*
PROPERTIES	* *Clear homogeneous liquid* * *Viscosity 1.008 cps at 70°F* * *Ratio ortho/complex polyphosphate 30/70* * *No heavy metals available* * *Freezing point <38°F* * *Shelf life (neat) >2 years* * *Spec. Gravity 1.367 +/- 0.01* * *% Total Phosphate 34.5 +/- 1.0* * *pH neat 5.2 +/- 0.5* * *Totally soluble and freeze/thaw stable* * *11.4 lbs. per gallon*
SHIPPING & HANDLING	*Aqua Mag is packaged in 1-5-15-30 & 55 gallon containers and bulk quantities from the manufacturing facility, local warehouses, and bulk terminals. The product is shipped in safety-sealed, food-grade, labeled containers or food-grade certified tankers. Each container is identified by lot number.*
APPLICATION RATE	*Aqua Mag is applied using a chemical metering pump. In most applications, Aqua Mag is fed as a concentrate without the necessity of dilution. For Aqua Mag dosage rates or answers to technical questions, contact the technical assistance department of The Kjell Corporation.*

[redacted]

Rev. 2/22/96

[redacted]

MATERIAL SAFETY DATA SHEET

THE KJELL CORPORATION
P.O. BOX 834
BELOIT, WISCONSIN 53512-0834
(800) 356-0422 (608) 755-0422

Product Name: **AQUA MAG**

Date Prepared: June 18, 1986 Last Revision: March 5, 1996

PRODUCT INFORMATION

Synonyms: Blended sodium phosphate
Chemical Family: Liquid phosphate blend
Formula: Proprietary
Maximum Use: 23.4 mg/L

HAZARD RATINGS AND PROTECTION INDEXES APPEAR IN APPROPRIATE BOXES.

HAZARD RATING
0 - MINIMAL HAZARD 1 - SLIGHT HAZARD
2 - MODERATE HAZARD 3 - SERIOUS HAZARD
4 - SEVERE HAZARD

PROTECTION INDEX
A - EYES B - HANDS
C - RESPIRATORY D - BODY

Note: Use of an asterisk (*) or other designation indicates that there may be chronic health effects present. See safety file on the product.

PRECAUTIONARY INFORMATION

Precautionary Statement: (As defined by OSHA Hazard Communications Standard)

No significant health effects reported from manufacturing locations

INGREDIENTS / COMPONENTS

Chemical Identity: Sodium ortho/polyphosphate blend
OSHA PEL: Not listed
ACGIH TLV: Not listed
CAS #: 68915-31-1
Hazard Class: None

PHYSICAL DATA

Boiling Point: Above 100° C.
Melting Point: Not applicable
Vapor Pressure: Not applicable
Vapor Density (Air = 1): Not applicable
Specific Gravity (H_2O = 1): 1.367 ± 0.01
Evaporation Rate (Butyl Acetate = 1): Non-volatile
Solubility in Water by Weight: Complete
pH (neat): 5.2 ± 0.5
Appearance: Clear liquid
Odor: Slight

FIRE AND EXPLOSION DATA

Flash Point:	Non-combustible
Flammable Limits	
Upper:	Not applicable
Lower:	Not applicable
Extinguishing Media:	Not applicable
Special Fire Fighting Procedures:	Not applicable
Unusual Fire & Explosion Hazards:	None

REACTIVITY DATA

Stability:	Stable
Incompatibility:	Concentrated chlorine and concentrated mineral acids
Hazardous Polymerization:	Will not occur
Conditions to Avoid:	Direct mixing of concentrates of chlorine and mineral acids
Hazardous Decomposition By-products:	Heat, chlorine, and sulfur dioxide

HEALTH HAZARD DATA

Routes of Exposure	
Eyes:	No published data
Skin Contact:	No published data
Skin Absorption:	No published data
Inhalation:	No published data
Ingestion:	No published data
Effects of Overexposure	
Acute Exposure:	No published data
Chronic Exposure:	When good industrial hygiene practices are followed, no significant inhalation hazard or skin irritation.
Other Health Effects	
Medical Conditions:	
Aggravated by Exposure:	None known
Carcinogenic Potential:	
NTP Annual Report:	Not listed
IARC Monographs:	Not listed
OSHA 29CFR Part 1910 Sub z:	Not listed
Additional Regulatory Information	
FDA:	GRAS list: permitted in food
USDA:	Listed as acceptable if followed by a potable water rinse
NSF International:	Certified to meet ANSI/NSF Standard 60
Underwriters Laboratories:	Certified to meet ANSI/NSF Standard 60

Emergency and First-Aid Procedures

Eyes:	Flush with water. If irritation occurs seek medical attention.
Skin:	Wash with water. If irritation occurs seek medical attention.
Inhalation:	Remove from exposure.
Ingestion:	Rinse mouth and dilute stomach contents with water or milk if available.
Decontamination Procedure:	Wash with water.
Notes to Physician:	Large doses may cause nausea and diarrhea.

STORAGE AND HANDLING

Spill or Leak Procedures:	Material should be wiped up for salvage or disposal. Flush with water.
Waste Disposal Method:	If not salvaged, dispose in a landfill in accordance with local, state, and federal regulations.
Precautions in Storing:	Should be stored in clean area for quality assurance. Keep container closed when not in use. Protect from freezing and extreme heat.

SPECIAL PROTECTION

Respiratory:	None required
Eye:	Not mandatory
Protective Gloves:	Not mandatory
Clothing & Equipment:	No special requirements
Ventilation Requirements:	No special requirements
Work/Hygiene Practices:	No special requirements. Follow good industrial hygiene practices.

TRANSPORTATION DATA

DOT Proper Shipping Name:	Sodium phosphate solution
DOT Classification:	Not regulated
DOT Labels:	Not required
DOT Placards:	Not required
Emergency Accident Precautions & Procedures:	Not hazardous. See instructions above for release or spill.

MANUFACTURER'S DISCLAIMER

While The Kjell Corporation will make every effort to insure the validity of this information, we must rely on the information given to us by our suppliers, and thus make no warranty, express or implied, as to the validity of this data.

Any use of this product or method of application which is not described in the Product Data Sheet is the responsibility of the user.

Environmental:

Degradability/Aquatic Toxicity	Aqua Mag constituents have been tested to be barely to non-toxic according to current classification levels.
< 1 ppm	Highly or strongly toxic
1-10 ppm	Toxic
10-100 ppm	Moderately toxic
100-1000 ppm	Slightly toxic
> 1000 ppm	Barely toxic to non-toxic

48-hr LC 50%	Daphne magna	3580 ppm*	
48-hr LC 50%	Lymnaea sp	2954 ppm*	
48-hr LC 50%	Fish	1650 ppm (n.n. orfe)	10,000 ppm @ pH 7**
25-hr/50-HR LC 50%	Daphne magna	1154 ppm/1089 ppm**	
0.5-hr EC 50%	Pseudomonas putida	1000-1500 ppm**	

EPA hazardous substance?	No	40CFR116-117
Waste Disposal Methods:	Must comply with all federal, state, and local disposal/discharge laws	
RCRA Status of Unused Material:	Non-hazardous	40CFR261

* Dowden, B.F., Bennett, H.J., "Toxicity of Selected Chemicals to Certain Animals," Journal WPCF, Sept. 1965, pp. 1308-1316.

**Schoeber, I.P., Huber, L., "Ecologically Relevant Data of Nonsurfactant Components of Detergents and Cleaners," Tenside Surfactants Detergents, 25, 99-107, (1988).

Appendix B

STORAGE AND COMPATIBLE MATERIALS

Minimum Tank Ratings:
Holds liquid weighing 12 lb/gal (1.44 kg/L) minimum
Handles liquid temperatures up to 130° F (49° C)
Storage temperature range in container of 45°- 75° F (7°- 24° C)
Temperature regulate the indoor storage of drums/bulk tanks, or insulate and heat outdoor tanks.
Prevent indoor drum/tank exposure to cold flooring by elevating with pallets or insulation.

Compatible Storage/Plumbing/Pumping Materials:
High-medium density polyethylene, cross-linked polyethylene, fiberglass, reinforced plastic, 316 Stainless Steel, glass lined/epoxy lined steel tanks; Schedule 80 PVC/CPVC piping, clear PVC and white polyethylene tubing; Ceramic, teflon, viton, hypalon, and PVC liquid end pump materials.

Materials to Avoid in storage/plumbing:
Black iron, mild steel, galvanized, aluminum, zinc, copper, lead, brass, bronze, and tin.

Metering equipment:
Diaphragm, and peristaltic type metering pumps.

SPARTON

SPARTON TECHNOLOGY

March 13, 1998

Carl Will
Hazardous And Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo
Santa Fe, New Mexico 87502

Re: Lab Reports for 1st Quarter 1998 Special Sampling.

Dear Mr. Will:

Enclosed are copies of American Environmental Network, Inc. lab reports, 802353 and 802361. This data is for ground water sampling of monitor wells MW-18, 23, 24, 25, 26, 27, PW-1, TW-01, TW-02 and MW-70 conducted on February 17-19, 1998. These wells were split sampled for Method 8260 volatiles with EPA's contractor, Phebe Davol of Tech Law Inc. Additionally MW-25 was split sampled with NMED-HRMB for M8260, hexavalent chromium and total RCRA metals. Please note sample TW-03 is a blind duplicate sample of TW-01 and TW-04 is a blind duplicate sample of TW-02

If you have any questions please contact John Wakefield or me at (505) 892-5300. Thank you for your attention to this matter.

Sincerely,
SPARTON TECHNOLOGY, INC.

Richard D. Mico
Vice President and General Manager

enclosures:

cc: (without enclosures)
Jan Appel
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