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MEMORANDUM

16 March 2004

To: Baird Swanson, NMED-GWQB
From: Carolyn Cooper, NMED-HWB
Subject: Sparton Technology Inc. Work Plan for the Proposed MW-71R Pump-and-Treat System

I reviewed Sparton's proposal and I agree with you that NMED/EPA should approve it. Your summary of the site conditions and history and my review of the available documents addressed most of my questions and concerns about the proposal. If Sparton is following the Groundwater Monitoring Program Plan (Attachment A to the Consent Decree), then their sampling protocol and procedures are acceptable. I am assuming that you also plan to continue splitting samples with the facility. My two main comments on the proposal are listed below:

1. Sparton's discussion of Potential Future Actions (p.3-4) is vague and the third bulleted item is not acceptable. If contaminant concentrations stabilize at a level above MCLs or continue to increase during the one-year proposed pump-and-treat operation, then Sparton must install additional deep monitoring wells, and possibly additional containment wells. Sparton's proposal to develop an investigation plan to assess the risks related to the presence of contaminants in the Deep Flow Zone will not be sufficient. As I recall, you discussed the issue of additional deep wells with Sparton in some technical dispute resolution meetings. I agree that we need to include a one-year time limit on monitoring before Sparton has to report on the progress of this system and propose the next action.

2. Sparton did not provide adequate information on the proposed construction of the re-injection well in the Pump-and-Treat System description (p.2). The proposal only states that the well will be installed adjacent to the carbon filter unit and will be 100 to 150 feet deep with 50 to 100 feet of screen. A more detailed description should be provided to NMED/EPA. The wells in the vicinity of the proposed re-injection well are sampled either annually (MW-48, MW-55, and MW-56) or semi-annually (MW-67). Increasing the sampling frequency for these wells during the year of conducting the pump-and-treat operation may also be warranted.