

Memorandum

To: Charles A. Barnes (USEPA), and Baird Swanson and Carolyn Cooper (NMED)
From: Gary L. Richardson (Metric) and Stavros S. Papadopoulos (SSP&A)
CC: Susan Widener (Sparton), James B. Harris (T&K), and Tony Hurst (HES)
Date: 10/20/2004
Subject: Sparton Technology, Inc., Former Coors Road Plant Remedial Program
Minutes of the October 13, 2004 Conference Call

To assess the severity of groundwater contamination detected in monitoring well MW-71R which is screened in the deep flow zone (DFZ) below the 4800-foot clay, Sparton Technology, Inc. (Sparton) proposed to pump well MW-71R for a period of one year, and reinject the pumped water into the unsaturated zone after treatment. Details of this proposed interim action were submitted to the United States Environmental Protection Agency (USEPA) and the New Mexico Environment Department (NMED) in a Work Plan dated January 14, 2004¹. The USEPA and NMED commented on this Work Plan on August 10, 2004². The details that were requested in these comments for inclusion in the Work Plan led Sparton to invoke on September 13, 2004 the dispute resolution mechanism³ allowed under the terms of the Consent Decree signed on March 3, 2000. To resolve the issues that were raised in this dispute, a conference call was held on October 13, 2004 at 2:00 pm MST (3:00 pm CST and 4:00 pm EST). Baird Swanson (NMED) made the arrangements for the conference call and informed the participants by e-mail on October 7, 2004; in his e-mail, Baird suggested that installing a DFZ recovery well near the off-site containment well CW-1 could be a good alternative to the proposed pump-and-treat of MW-71R and asked the participants to give his suggestion some thought prior to the scheduled conference call.

The participants to the call were:

Charles (Chuck) A. Barnes, USEPA, Region VI
Baird Swanson, NMED, Groundwater Bureau
Carolyn Cooper, NMED, Hazardous waste Bureau
Stavros S. Papadopoulos, SSP&A
Gary L. Richardson, METRIC Corporation

The purpose of this memorandum is to present the minutes of this conference call.

Stavros expressed his surprise to the extent of the comments on the Work Plan. He stated that the proposed pump-and-treat of MW-71R was based on verbal agreements that were made with Baird and

¹ **Sparton Technology Inc. Former Coors Plant Remedial Program, Work Plan for the Proposed MW-71R Pump-and-Treat System**, prepared by S. S. Papadopoulos & Associates, Inc.(SSP&A) and Metric Corporation, transmitted to USEPA and NMED by letter dated January 14, 2004 from Stavros S. Papadopoulos of SSP&A.

² **Technical Review - Sparton Technology Inc. Former Coors Plant Remedial Program, Work Plan for the Proposed MW-71R Pump-and-Treat System, Sparton Technology, Inc. Albuquerque, New Mexico, EPA ID No. NMD083212332**, transmitted by letter dated August 10, 2004 from Charles A. Barnes of USEPA to Tony Hurst of Hurst Engineering Services (HES), Project Coordinator for Sparton.

³ **Notice of Dispute, Sparton technology, Inc. Consent Decree, Civil Action No. CIV 97 0206 CH/JHG, EPA ID No. NMD083212332**, September 13, 2004 letter to the Plaintiffs from James B. Harris of Thompson & Knight (T&K), counsel to Sparton Technology, Inc.

To summarize, the following agreements were made during the conference call:

- The proposal to implement the MW-71R pump-and-treat system will be abandoned;
- Because this proposal is no longer being considered for implementation, there is no need to revise the Work Plan in accordance with the comments received from USEPA/NMED;
- Sparton will prepare a new Work Plan that will describe the installation of a DFZ monitoring or standby-extraction well near CW-1. The Work Plan will include:
 - Details on the installation and testing of the well;
 - The monitoring schedule for the well;
 - The criteria for triggering the operation of the well; and
 - Details on the operation of the well, and on the treatment/discharge of the pumped water.
- The Work Plan will be relatively simple, and will address the hydrogeologic setting and history of the site by reference to previous reports and documents;
- The Work Plan will be submitted to USEPA/NMED by about mid-November, 2004;
- The agencies will review and comment on the Work Plan by Christmas 2004;
- Gary and Stavros will prepare the minutes for the conference call; and
- Chuck and Baird will take care of resolving the "dispute" using these conference call minutes.