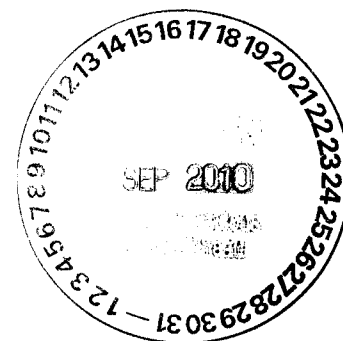




**S.S. PAPADOPULOS & ASSOCIATES, INC.**  
ENVIRONMENTAL & WATER-RESOURCE CONSULTANTS



September 14, 2010

Charles Hendrickson, Sparton Project Coordinator  
U.S. Environmental Protection Agency  
Region VI – Federal Facility Section (6PD-F)  
1445 Ross Avenue  
Dallas, TX 75202-2733  
(3 copies)

John Kieling, Sparton Project Coordinator  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

Director, Water & Waste Management Division  
New Mexico Environment Department  
1190 St. Francis Drive, 4<sup>th</sup> Floor  
Santa Fe, NM 87505

Chief, Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

Chief, Groundwater Quality Bureau  
New Mexico Environment Department  
1190 St. Francis Drive, 4<sup>th</sup> Floor  
Santa Fe, NM 87505

Mr. Baird Swanson  
New Mexico Environment Department  
NMED-District 1  
5500 San Antonio, NE  
Albuquerque, NM 87109

Subject: Sparton Technology, Inc. Former Coors Road Plant Remedial Program  
Revised pages for the 2009 Annual Report

Gentlemen:

On behalf of Sparton Technology, Inc. (Sparton), S.S. Papadopoulos & Associates, Inc. (SSP&A) is pleased to submit the attached revised pages for the 2009 Annual Report. These revisions were made in response to comments received from the agencies.<sup>1</sup> As requested in these comments, the revisions consist of the addition of a paragraph discussing the off-site air stripper in Section 5.4.1 of the report, and the correction of the symbols representing measured and calculated concentrations in Figure D.7. If these revisions meet the contingencies on the approval of the 2009 Annual Report, we would appreciate your informing Mr. Lerczak of Sparton that the report has been approved.

<sup>1</sup> Letter dated August 30, 2010 from John E. Kieling of NMED and Chuck Hendrickson of USEPA to Joseph S. Lerczak of Sparton, Re: 2009 Annual Report Approval with Modification, Sparton Technology, Inc., EPA ID No. NMD083212332.

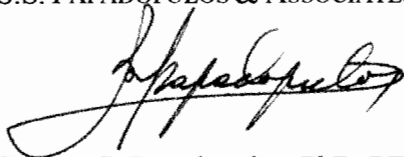
United States Environmental Protection Agency  
New Mexico Environment department  
September 14, 2010  
Page 2

I certify under penalty of law that attached revised pages for the 2009 Annual Report were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of either the person or persons who manage the system and/or the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I further certify, to the best of my knowledge and belief, that this document is consistent with the applicable requirements of the Consent Decree entered among the New Mexico Environment Department, the U.S. Environmental Protection Agency, Sparton Technology, Inc., and others in connection with Civil Action No. CIV 97 0206 LH/JHG, United States District Court for the District of New Mexico. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning the report, please contact me.

Sincerely,

S.S. PAPANOPULOS & ASSOCIATES, INC.



Stavros S. Papadopoulos, PhD, PE, NAE  
Founder & Senior Principal

cc: Secretary, Sparton Technology, Inc., c/o Mr. Joseph S. Lerczak  
Mr. Gregory A. Slome, Senior Vice President and Chief  
Financial Officer of Sparton Corporation  
Mr. Joseph S. Lerczak, Director of Treasury and Forecasting  
and Secretary of Sparton Corporation (3 copies)  
Mr. James B. Harris, Thompson & Knight LLP  
Mr. Tony Hurst, Hurst Engineering Services (2 copies)  
Mr. Gary L. Richardson, Metric Corporation

Enclosures

## 5.4 Site Permits

### 5.4.1 Off-Site Containment System

The infiltration gallery associated with the off-site containment system is operated under the Discharge Permit (State of New Mexico Groundwater Discharge Permit DP-1184). This permit requires monthly sampling of the treatment system effluent, and the quarterly sampling of the infiltration gallery monitoring wells MW-74, MW-75 and MW-76. The samples are analyzed for TCE, DCE, TCA, chromium, iron, and manganese. The concentrations of these constituents must not exceed the maximum allowable concentrations for groundwater set by NMWQCC. As required by the current Discharge Permit, the analysis results of all samples collected during 2009 were reported to the NMED Groundwater Bureau on January 29, 2010. The sampling results met the permit requirements throughout the year.

The air stripper associated with the off-site containment system is operated under Air Quality Source Registration No. NM/001/00462/967, issued by the Air Quality Services Section, Air Pollution Control Division, Environmental Health Department, City of Albuquerque. This registration limits the hourly and annual VOC mass emitted by the stripper to 0.32 lbs/hr and 1.37 tons/yr. The emissions from the air stripper were calculated in June 1999, after the stripper had been put into continuous operation; the results of this calculation, which were reported to the agency that issued the registration, were in full compliance with the specified emission limits. Under the terms of the registration, further monitoring and/or reporting of the emissions from the air stripper was not required, and has not been carried out since that time. Based on the average pumping rate of the system during 2009 (218 gpm), and the average concentrations of TCE, DCE, and TCA in the influent to the stripper (870, 72, and 2.7  $\mu\text{g/L}$ , respectively), the VOC mass emitted during the year averaged 0.10 lbs/hr or 0.45 tons/yr.

No violation notices were received during 2009 for activities associated with the operation of the off-site containment system.

### 5.4.2 Source Containment System

The rapid infiltration ponds associated with the source containment system are also operated under State of New Mexico Groundwater Discharge Permit DP-1184, and are subject to the above-stated requirements of this permit. The monitoring wells for this system are MW-17, MW-77 and MW-78. The data collected from the system met the requirements of the Groundwater Discharge Permit throughout 2009.

The air stripper associated with the source containment system is operated under Albuquerque/Bernalillo County Authority-to-Construct Permit No. 1203. This permit specifies emission limits for total VOCs, TCE, DCE, and TCA. Emissions from the air stripper are calculated annually by using influent water-quality concentrations and the air stripper blower capacity. The calculated emissions are reported to the Albuquerque Air Quality Division by March 15 every year as required by the permit.

The requirements of Permit No. 1203 were met throughout 2009. No violation notices were received during 2009 for activities associated with operation of the source containment system.

## 5.5 Contacts

On November 2, 2009 and November 16, 2009, Baird Swanson and Brian Salem of NMED were on site to assist in diffusion bag sampling of monitoring well OB-1.

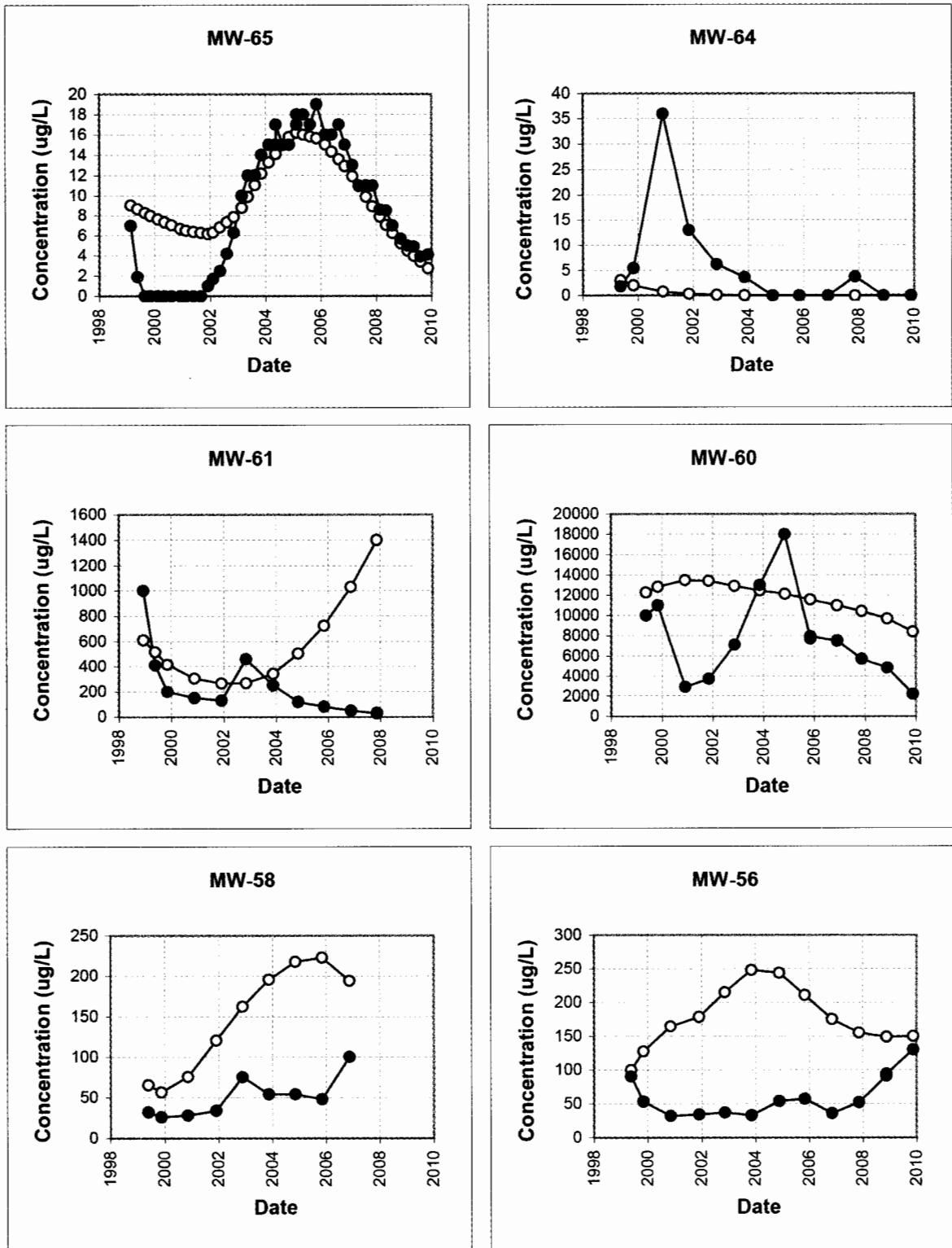
Under the terms of the Consent Decree,<sup>1</sup> Sparton is required to prepare an annual Fact Sheet summarizing the status of the remedial actions, and after approval by USEPA/NMED, distribute this Fact Sheet to property owners located above the plume and adjacent to the off-site treatment plant water discharge pipeline. Annual Fact Sheets reporting on remedial activities during 1999, 2000, and 2001 were prepared by Sparton, approved by the regulatory agencies, and distributed to the property owners. Draft Fact Sheets prepared by Sparton during the next several years did not get the approval of USEPA/NMED because the 2003 and subsequent Annual Reports had not been yet approved<sup>2</sup> and, therefore, were not distributed to the property owners. After the approval of the 2003-2006 Annual Reports in December 2008,<sup>3</sup> Sparton prepared a combined 2002-2006 Fact Sheet that was submitted to the USEPA/NMED on March 6, 2009 and approved on May 8, 2009; in June 2009, this combined Fact Sheet was distributed to the property owners located above the plume and adjacent to the off-site treatment plant water discharge pipeline.

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<sup>15</sup> Attachment B to the Consent Decree in Albuquerque v. Sparton Technology, Inc., No. CV 07 0206 (D.N.M.), Public Involvement Plan for Corrective Measure Activities.

<sup>16</sup> Under the terms of the Consent Decree the Fact Sheets cannot be finalized before the Annual Reports for the years covered by the Fact Sheets have been approved.

<sup>17</sup> See document cited in Footnote 4.



● Measured ○ Calculated

Figure D.7 Comparison of Calculated to Observed TCE Concentrations at Selected Monitoring Wells  
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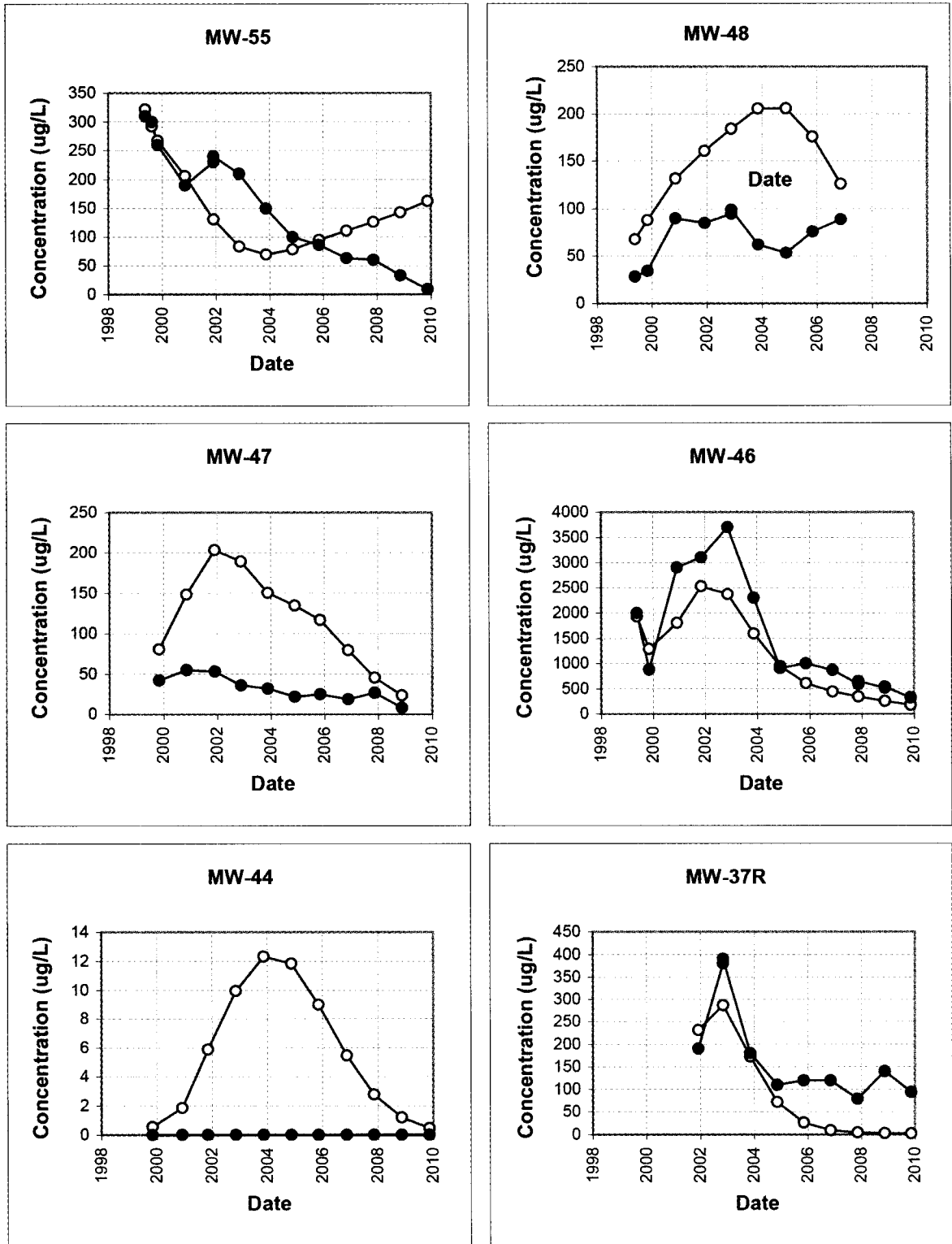


Figure D.7 Comparison of Calculated to Observed TCE Concentrations at Selected Monitoring Wells  
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