



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

April 24, 2018

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Hazardous Waste Bureau
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**Subject: Sparton Technology, Inc. - Former Coors Road Plant Remedial Program
Request for Replacement of Well MW-62 with Well MW-47R**

Gentlemen:

As mentioned in the last two monthly progress reports for Sparton's former Coors Road Plant, it has not been possible to sample monitoring well MW-62 as part of the 1st Quarter 2018 sampling event.

The sampling tool (bailer) used for sampling the well was lodged during purging and it was stuck at the bottom of the well. Rodgers and Co. attempted to retrieve the bailer, but their retrieval device also got stuck at the bottom of the well. Further attempts made to retrieve the equipment from the well resulted in removing the retrieval equipment but not the bailer, which remains stuck at the bottom of the well. It is concluded that it is impossible to remove the remaining equipment from the well, which prevents its sampling.

Such issues, although not routinely encountered in groundwater sampling, do occasionally occur and were more likely to occur at this well. It has a very narrow diameter (2 inches), a long length of casing (115 feet), and a sampling bailer three feet in length and 1.75 inches of diameter. Small changes in the verticality of the well casing, which would not be unexpected given that this well has been in place for more than 25 years while development has gone on around it could result in its bending. As a result, the free movement of the bailer could be impacted ultimately causing entrapment of the sampling equipment. That is what we believe happened here.

Given the current state of well MW-62, Sparton proposes to plug and abandon the well. However, this well is included in the quarterly sampling program, as defined in Groundwater Monitoring Program Plan of the Consent Decree. Replacing well MW-62 by installing a new monitoring well in its vicinity is not recommended, as monitoring of aquifer conditions at or near well MW-62 does not provide material information required for delineating the contaminant plumes or reaching conclusions regarding plume migration patterns and, ultimately, hydraulic containment of those plumes. Instead, Sparton believes that using data from well MW-47R, which is located north of

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well MW-62 and has been used for delineating the southern boundaries of the VOC and chromium plumes in the last several years, provides the necessary information in this area of the plume for completing the annual reports. Quarterly concentration data from that well would provide more timely information regarding plume migration and containment, due to its proximity to the plume boundary. If the use of well MW-47R in place of well MW-62 is acceptable, we would sample it quarterly instead of annually.

Given the plume characteristics observed in recent years, there are other monitoring locations similar to well MW-62 that could be eliminated from the quarterly sampling program, with or without replacement by other wells. We may want to address this issue in the future.

We would appreciate your immediate attention to this matter, as the 2nd Quarter 2018 sampling event is scheduled for the first week of May.

Please do not hesitate to contact me or Stavros Papadopoulos if you have any questions.

Sincerely,

S. S. PAPADOPULOS & ASSOCIATES, INC.



Alex Spiliotopoulos, PhD
Associate & Senior Hydrogeologist



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

cc: Mr. Ernesto Martinez, EHS Corporate Manager
of Sparton Corporation
Mr. James B. Harris, Thompson & Knight LLP
Mr. Charles M. Easterling, OCCAM|EC

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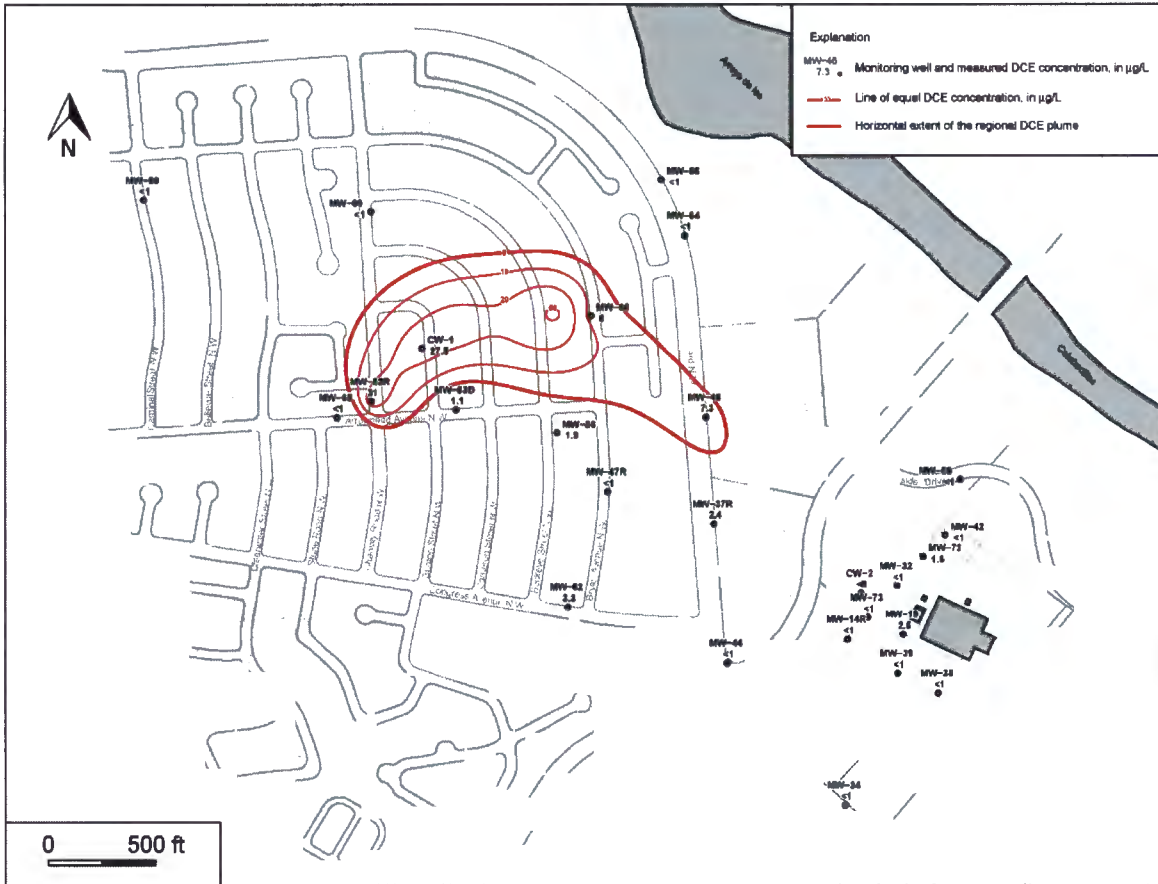


Figure 4.19: Horizontal Extent of the Regional DCE Plume - November 2017

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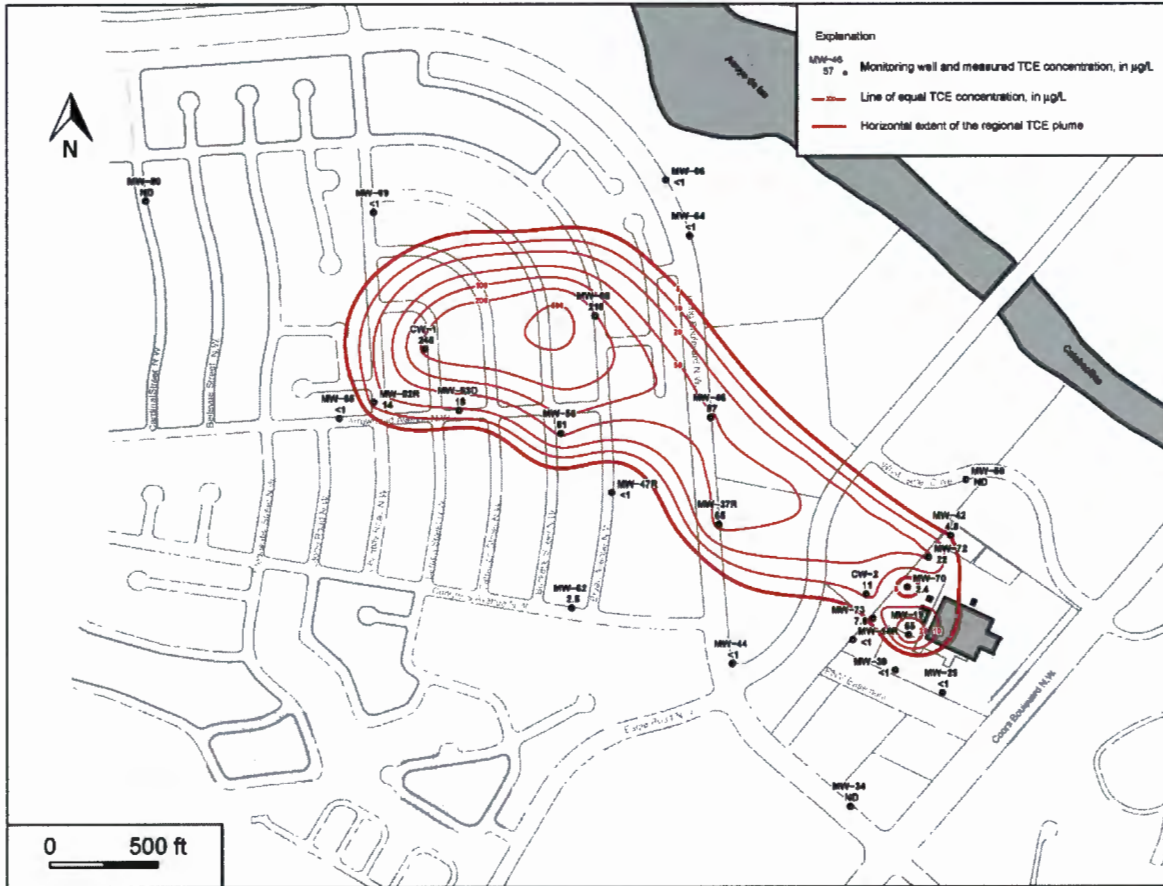


Figure 4.17: Horizontal Extent of the Regional TCE Plume - November 2017

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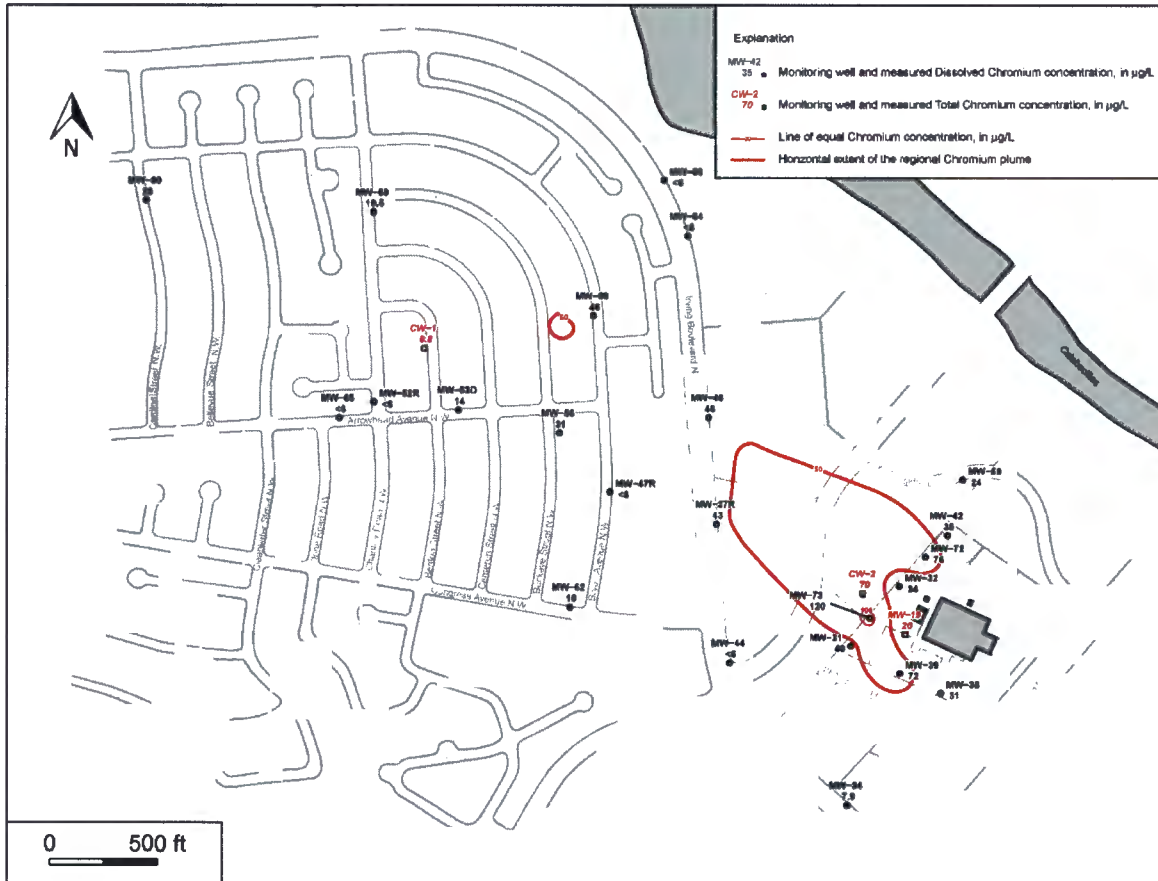


Figure 4.21: Horizontal Extent of the Regional Chromium Plume - November 2017