



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

July 25, 2019

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**Subject: Sparton Technology, Inc: Former Coors Road Plant Remedial Program
Proposal for 1,4-Dioxane Sampling**

Ladies and Gentlemen:

As agreed upon during the June 26, 2019 Santa Fe, New Mexico meeting¹ between representatives of the regulatory agencies and of Sparton Technology, Inc. (Sparton), Sparton is proposing to conduct the following 1,4-dioxane sampling program:

1. During the Fourth Quarter 2019 (November 2019) sampling event, which normally includes the sampling of all existing monitoring wells (57 wells), an additional sample will be obtained from each well for 1,4-dioxane analysis;
2. At about the mid-point of this sampling event, influent and effluent samples will also be collected, from both the off-site and source containment systems, for 1,4-dioxane analyses;

¹ E-mail dated June 26, 2019 from John Verheul of NMENV to James B. Harris of Thompson & Knight LLP with cc to Michael Donnellan of USDOJ on the subject Re: Meeting..

United States Environmental Protection Agency
New Mexico Environment Department
July 25, 2019
Page 2

3. Effluent samples from both systems will be collected as duplicates; duplicate samples will also be collected from monitoring wells MW-46, MW-53D, MW-60, MW-74, MW-78, and MW-80;
4. All samples will be analyzed for 1,4-dioxane using EPA Method 8270C (or EPA- and NMED-approved equivalent); and
5. Besides being reported in the 2019 Annual Report, the results of this sampling event will be reported to NMED within 30 days of receipt of the last laboratory report.

Any further action on the 1,4-dioxane issue, including modifications, if any, that may be required to the renewal application for Discharge Permit DP-1184, will be decided based on a review and evaluation of these results.

During the June 26, 2019 meeting an agreement was also reached for Sparton to submit a plan for addressing the vapor intrusion issue; this plan is due for submittal by or before August 26, 2019 and will be prepared and submitted in a separate document by that date.

We certify under penalty of law that this document was prepared by the undersigned and that, to the best of our knowledge and belief, the information submitted is true, accurate, and complete. We further certify, to the best of our 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. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

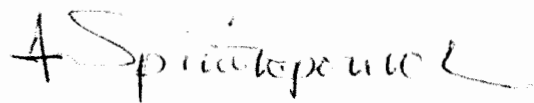
If you have any questions concerning the report, please contact us.

Sincerely,

S. S. PAPANOPULOS & ASSOCIATES, INC.



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



Alex Spiliotopoulos, PhD
Associate & Senior Hydrogeologist

cc: John Verheul, NMED, OGC
Justin Ball, NMED, GWQB



United States Environmental Protection Agency
New Mexico Environment Department

July 25, 2019

Page 3

Steve Pullen, NMED, GWQB

Melanie Sandoval, NMED, GWQB

Mr. Paul Warmus, Cerberus

Mr. Ernesto Martinez, EHS Corporate Manager of Sparton Corporation

Mr. Joseph S. Lerczak, Sparton Corporation

Mr. James B. Harris, Thompson & Knight LLP

Mr. Bob Marley, EA, Project Coordinator for Sparton