State of New Mexico
ENVIRONMENT DEPARTMENT
Ground Water Protection and Remediation Bureau
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2918 phone
(505) 827-2965 fax

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

March 26, 1996

Desi Crouther, Chief
Hazardous Waste Enforcement Branch
U.S. Environmental Protection Agency
Region VI
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

RE: Sparton Request for 60 Day Extension for Submission of Final CMS

Dear Mr. Crouther:

The New Mexico Environment Department (NMED) is in receipt of a copy of the letter sent by Sparton Technology (Sparton) to the U.S. Environmental Protection Agency (EPA) dated March 25, 1996 requesting a 60 day extension for the submission of a final Corrective Measures Study (CMS). NMED does not believe that a 60 day extension is warranted for completion of the CMS. Specifically, NMED believes that some of the tasks that Sparton describes do not need to be done prior to submittal of the CMS (Tasks 3, 4, 5 and 6) while others should have been done long before now (Tasks 1, 2, 8 and 9). The remaining tasks should not require an extension.

If an extension is granted to Sparton by EPA, NMED requests that the following be agreed to by Sparton:

1) As part of the soil gas study proposed by Sparton, at least two permanent vapor probe nests will be installed in the source area. Sparton will mobilize for the installation of these probes no later than the end of April. Each nest will contain a probe every 10 vertical feet at a minimum. Specs and an approximate schematic for such a nest are attached;

2) No additional extensions will be granted to Sparton for completion of the CMS.

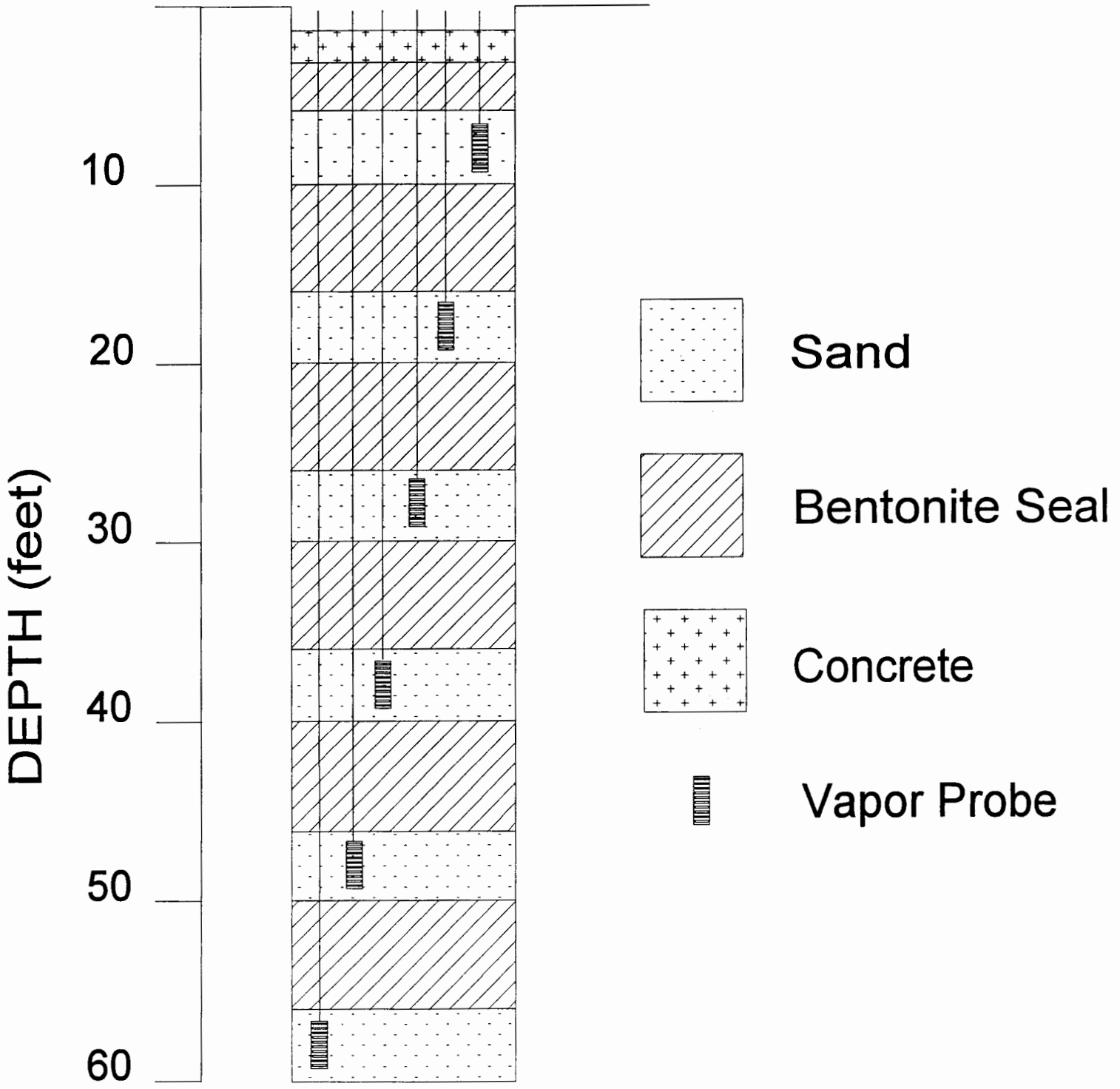
The CMS process has taken far too long as it is. NMED hopes that time extensions will be granted by EPA only for appropriate requests and for appropriate amounts of time.

Sincerely,

Ed Kelley, Director
Water and Waste Management Division

cc: Dennis McQuillan, GWQB
Ron Kern, HRMB

VAPOR PROBE NEST



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OGC-000592

VAPOR PROBE CONSTRUCTION

Screen: Constructed of a 12" to 18" length of 1" or 2" diameter 10-slot PVC screen. The screen should be capped on one end. On the other end should be a fitting which slips over the screen and has 3/4" internal threads. A brass fitting with 3/4" treads on one end and 1/4" compression union on the other end should be threaded into the fitting at the end of the screen.

Riser Tube: 1/4" diameter copper tube that has been decontaminated (as is used for ice makers). The tubing is connected at one end to the compression union at the end of the screen. The screen is then lowered down into the hole as the tubing is uncoiled. The copper tubing should be marked with the depth and capped at the surface.

Filter Pack: The volume surrounding the screen should be filled with a 12/20 silica sand. The sand should extend at least one foot above and below the screen.

Seal: Between each screen/sand interval should be a low permeability seal. This seal should have a high bentonite content and a lower permeability than the surrounding formation. The material should be dry. If the interval of the seal is large, the middle portion can contain a higher permeability sand/bentonite mixture. However, each low permeability layer should be at least one foot thick.