

SPARTON

SPARTON TECHNOLOGY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



*Barbara ✓
Woby Co
Please to direct
for response
Benito*

August 5, 1996

Mr. Benito Garcia
Bureau Chief
HAZARDOUS AND RADIOACTIVE MATERIALS BUREAU
New Mexico Environment Department
PO Box 26110
Santa Fe, New Mexico 87505

Re: Waste Classification of Vapor Probe Drill Cuttings.

Dear Mr. Garcia:

Recently Sparton Technology, Inc. installed a vapor probe well through the pond cap closure area to monitor vadose zone soil gas concentrations. During that installation eight drums of drill cuttings were generated. These drums were labeled hazardous waste and moved to our 90 day hazardous waste storage area. Headspace PID readings were taken and four drums with the highest readings were cored for composite sampling. Attached are analytical results for RCRA volatiles and metals via TCLP zero-headspace and non-volatile extraction. Results indicate that this material is not classified as a RCRA hazardous waste. We propose to have Perma-Fix, Inc. solidify and stabilize this waste as a secondary precaution and dispose of it in a Subtitle D landfill as non-hazardous waste.

Could you review this matter and inform us as to whether this is a correct interpretation of RCRA regulations and an acceptable disposal procedure .

If you have any additional questions please contact John Wakefield or me at (505) 892-5300. Thank you for your attention to this matter.

Sincerely,
SPARTON TECHNOLOGY, INC.

R. D. Mico
Richard D. Mico
Vice President and General Manager

enclosure:

cc: Mr. J. Appel
Mr. P. Chandler
Mr. G. Richardson
Mr. J. Wakefield



ANACHEM INC.

8 Prestige Circle, Suite 104 • Allen, Texas 75002
214/727-9003 • FAX # 214/727-9686 • 1-800-966-1186

Customer Name: Sparton Technology Inc.
Date Received: July 20, 1996 at 10:06:19
Date Reported: July 31, 1996
Submission #: 9607000249
Project: VP-1 CUTTINGS

SAMPLES The submission consisted of 1 sample with sample I.D. shown in the attached data table.

TESTS The sample listed in the attached result pages was analyzed for:


- * TCLP MERCURY (EPA 7470)
- * TCLP NON-VOLATILE EXTRACTION (EPA 1311)
- * TCLP RCRA METALS (EPA 6010)
- * TCLP VOLATILES (EPA 8260)
- * TCLP ZHE FOR VOLATILE ORGANICS (EPA 1311)


Distribution Of Reports

1-Mr. John Wakefield of Sparton Technology Inc.
Ph. 505-892-5300 Fax 505-892-5515

Submission #: 9607000249 lims

Respectfully Submitted,
Anachem, Inc.


Howard H. Hayden, B.S.
Chemist


C.E. Newton, Ph.D.
Chemist

NOTE: Submitted material will be retained for 60 days unless notified or consumed in analysis. Material determined to be hazardous will be returned or a \$20 disposal fee will be assessed. Our letters and reports are for the exclusive use of the client to whom they are addressed. The use of our name must receive our prior written approval. Our letters and reports apply to the sample tested and/or inspected, and are not necessarily indicative of the qualities of apparently identical or similar materials.

Client Name: Sparton Technology Inc.
 Submission #: 96070002
 Project Name: VP-1 CUTTINGS
 Report Date: 08/01/96

Client Sample #: VP-1, CUTTINGS, #4,5,6,7

Laboratory ID #: 69451 Order Type: Normal Matrix: Soil
 Sample Container: 2x4oz EPA Approved Glass Jar\White lid
 Sampling Location: COORS RD. FACILITY, ALB, NM
 Sampling Date: 07/19/96
 Temperature (Celcius):4

TCLP MERCURY (EPA 7470)

<u>C.A.S.#</u>	<u>Analyte</u>	<u>Results(mg/l)</u>	<u>Detection Limit</u>	<u>Haz.Limit</u>
7439-97-6	TCLP Mercury	<0.0004	0.0004	0.2

TCLP NON-VOLATILE EXTRACTION (EPA 1311)

TCLP Extraction Date: 07/23/96

TCLP RCRA METALS (EPA 6010)

<u>C.A.S.#</u>	<u>Analyte</u>	<u>Results(mg/l)</u>	<u>Detection Limit</u>	<u>Haz.Limit</u>
7440-38-2	Arsenic	<0.061	0.061	5
7440-39-3	Barium	0.367	0.001	100
7440-43-9	Cadmium	<0.008	0.008	1
7440-47-3	Chromium	3.75	0.0075	5
7439-92-1	Lead	0.109	0.040	5
7482-49-2	Selenium	<0.050	0.050	1
7440-39-2	Silver	<0.030	0.030	5

TCLP VOLATILES (EPA 8260)

Date analyzed: 07/23/96

<u>C.A.S.#</u>	<u>Analyte</u>	<u>Results(mg/l)</u>	<u>Detection Limit</u>	<u>Haz.Limit</u>
71-43-2	Benzene	<0.10	0.10	0.5
56-23-5	Carbon Tetrachloride	<0.10	0.10	0.5
108-90-7	Chlorobenzene	<0.10	0.10	100
67-66-3	Chloroform	<0.10	0.10	6.0
106-46-7	1,4-Dichlorobenzene	<0.10	0.10	7.5
107-06-2	1,2-Dichloroethane	<0.10	0.10	0.5
75-35-4	1,1-Dichloroethylene	<0.10	0.10	0.7
78-93-3	Methyl Ethyl Ketone	<0.10	0.10	200.0
127-18-4	Tetrachloroethylene	<0.10	0.10	0.7
79-01-6	Trichloroethylene	<0.10	0.10	0.5
75-01-4	Vinyl Chloride	<0.10	0.10	0.2

TCLP VOA EXTRACT CONTAINS NO TARGET OR NON TARGET DETECTABLE VOLATILES.

TCLP ZHE FOR VOLATILE ORGANICS (EPA 1311)

TCLP ZHE Extraction Date: 07/22/96

TCLP VOLATILE ORGANICS QUALITY CONTROL DATA

<u>METHOD</u>	<u>ANALYST</u>	<u>MATRIX</u>	<u>DATE EXTRACTED</u>	<u>DATE ANALYZED</u>
8260	Howard Hayden	Liquid	----	7/23/96

<u>SPIKE COMPOUND</u>	<u>SPIKE AMOUNT</u>	<u>% REC 1</u>	<u>% REC 2</u>	<u>% REC QC LIMIT</u>	<u>% VAR.</u>	<u>% VAR QC LIMIT</u>
1,1-Dichloroethene	20 ppb	84.3	86.8	20-234	2.9	25.0
Trichloroethene	20 ppb	97.8	101	71-157	3.2	25.0
Benzene	20 ppb	93.8	98.1	37-151	4.4	25.0
Toluene	20 ppb	91.0	96.6	47-150	5.8	25.0
Chlorobenzene	20 ppb	104	108	37-160	3.7	25.0

QUALITY CONTROL DATA

<u>ANALYTE</u>	<u>DATE ANALYZED</u>	<u>SPIKE (ppm)</u>	<u>STAND. DEV.</u>	<u>COEFF. OF VAR %</u>	<u>REC1/%</u>	<u>REC2/%</u>
Silver	7/29/96	4.0	0.127	4.1	83.6	77.3
Arsenic	7/29/96	4.0	0.315	7.4	101.8	90.6
Barium	7/29/96	4.0	0.717	14.6	129.8	104.5
Cadmium	7/29/96	4.0	0.148	3.9	90.0	84.8
Chromium	7/29/96	4.0	0.019	0.5	92.8	92.1
Lead	7/29/96	4.0	0.230	5.5	102.6	94.5
Selenium	7/29/96	4.0	0.345	8.1	99.8	87.6
Mercury	7/23/96	---	0.007	0.1	93	93

Standard Deviation = $(x1-x2)/1.414$

Coefficient of Variability (%) = $(S.D./Avg.) \times 100$

Recovery (%) = $[(spiked-unsiked)/expected] \times 100$