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2001/2002

James



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

JUL 2002

July 22, 2002

United States Environmental Protection Agency (3 copies)
Region VI - Technical Section (6EN-HX)
Compliance Assurance & Enforcement Division
1445 Ross Avenue
Dallas, TX 75202
Attn: Sparton Technology, Inc. Project Coordinator Michael Hebert

Director, Water & Waste Management Division (1 copy)
New Mexico Environment Department
1190 St. Francis Drive, 4th Floor
Santa Fe, NM 87505

✓ Chief, Hazardous & Radioactive Materials Bureau (1 copy)
New Mexico Environment Department
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Chief, Groundwater Bureau (1 copy)
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Mr. Baird Swanson (1 copy)
New Mexico Environment Department – District 1
4131 Montgomery Boulevard, NE
Albuquerque, NM 87109

Subject: Response to USEPA/NMED Comments on the
Sparton Technology, Inc. Former Coors Road Plant Remedial Program
2001 Annual Report

Gentlemen:

On behalf of Sparton Technology, Inc. (Sparton), S. S. Papadopoulos & Associates, Inc. (SSP&A) is pleased to submit the attached response to the two (2) brief comments that accompanied the July 18, 2002 approval of the 2001 Annual Report.

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New Mexico Environment Department
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I certify under penalty of law that this response document was 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 document, please contact me.

Sincerely,

S. S. PAPANOPULOS & ASSOCIATES, INC.



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

cc: Secretary, Sparton Technology, Inc., w/ 1 copy
Ms. Susan Widener, w/1 copy
Mr. James B. Harris, w/1 copy
Mr. Tony Hurst, w/2 copies
Mr. Gary L. Richardson, w/1 copy



Response to
USEPA/NMED Comments on the
Sparton Technology, Inc.
Former Coors Road Plant Remedial Program
2001 Annual Report

1. *Figure 2.3 - There is a label for MW-77 (i.e., north of MW-63) which does not correspond to any particular location.*

This label should be deleted; it is a graphics error that somehow escaped the review process. Well MW-77 is located on the east corner of the Sparton property where it has been correctly labeled.

2. *Figure 5.15 - There is a discrepancy in the contaminant history charts for MW-9 between the 2000 Annual Report to the 2001 Annual Report. Within the 2000 Annual Report, the result for TCA for the January 22, 1998, sample (i.e., < 1 ppb) was depicted in Figure 5.15. However, in the 2001 Annual Report, this data point was apparently omitted. Sparton should provide an explanation for this discrepancy.*

The TCA concentration of less than the detection limit of 1 µg/L reported for the January 22, 1998 sample from this well was the only time TCA in the well was reported to be below detection limit; this result is not consistent with TCA concentrations in prior and later samples from the well. Although it had been included in Figure 5.15 of both the 1999 and the 2000 Annual reports, the result was deemed to be an error during the 2001 review of the data and, therefore, it was not included in the preparation of Figure 5.15 for the 2001 Annual Report.