



ENTERED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

February 5, 2016

Mr. Ernesto Martinez
EHS Corporate Manage
Sparton Technology, Inc.
30167 Power Line Road
Brooksville, FL 34602

**RE: APPROVAL WITH MODIFICATIONS
REQUEST FOR APPROVAL OF CHANGES TO REPORTING
REQUIREMENTS AND TO SAMPLING METHODOLOGY
SPARTON TECHNOLOGY, INC. – FORMER COORS ROAD REMEDIAL
PROGRAM
EPA ID No. NMD083212332**

Dear Mr. Martinez:

The Environmental Protection Agency (EPA) and the New Mexico Environment Department (NMED) have reviewed the above-referenced request dated July 23, 2015, submitted by S. S. Papadopoulos & Associates, Inc. on behalf of Sparton Technology, Inc. (Sparton). The letter includes three separate requests.

The first request is for discontinuation of submittal of the semi-annual progress reports on the basis of the long-established stability of water levels and of water-quality levels. This written request to change the frequency of progress report submittals is in accordance with Section VII,

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Paragraph 20 of the Consent Decree [Civil Action No. CIV 97 0206 LH/JHG, dated March 3, 2000]. This request is approved.

The second request in the letter is for modifications to the monitoring well sampling methods. Basically, the request is for approval for the use, as alternative sampling methods at Sparton's option, of Snap Samplers at 25 listed wells and of Polyethylene Diffusion Bag (PDB) samplers at 32 other listed wells. The third, related, request is for discontinuation of chromium analysis of groundwater samples from the group of 32 listed wells.

NMED Hazardous Waste Bureau does not control Discharge Permit DP-1184. For approvals to your requests related to the discharge permit, please contact the NMED Ground Water Quality Bureau.

As your requests relate to the Consent Decree, NMED Hazardous Waste Bureau and EPA approve the second and third requests with the following conditions:

- Sparton shall submit for approval a revision of, or addendum to, the Sampling and Analysis Plan (SAP) which includes the new sampling methodologies, their Standard Operating Procedures, and data quality objectives (DQOs).
- Sparton shall then, after approval of the SAP or addendum, conduct a minimum of two rounds of contemporaneous sampling using both the present sampling methods and the proposed new methods (i.e., Snap Sampler and PDB), with submission of a report that summarizes and compares the results. Unacceptable results (e.g., variability of concentrations more than 10%, consistently lower concentrations in the new methods) may result in withdrawal of NMED and EPA approval of their use or the requirement for additional comparison sampling.
- We note that groundwater chromium levels have become a chronic concern. Sparton shall provide a map of the chromium plume in and around the on-site area in Annual Reports, with text describing chromium remediation efforts and progress, until this concern has abated.

We agree that these requests do not involve material modifications to the Consent Decree, pursuant to Section XXVIII, Paragraph 105. Therefore, these changes may be made through written agreement between Sparton, NMED, and EPA.

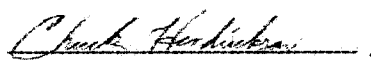
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If you have any questions, please contact Dave Cobrain at 505-476-6055 or Chuck Hendrickson at 214-665-2196.

Sincerely,



Dave Cobrain
Program Manager, Hazardous Waste Bureau
New Mexico Environment Department



Chuck Hendrickson
Project Coordinator
U.S. EPA Region 6

cc: John Kieling, Chief, NMED HWB
Michelle Hunter, Chief, NMED GWQB
Brian Salem, NMED HWB
Justin Ball, NMED GWQB

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