



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

September 21, 2016

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

**RE: SPARTON TECHNOLOGY, INC. – FORMER COORS ROAD
REMEDIAL PROGRAM REQUEST FOR APPROVAL OF THE USE OF
PASSIVE SAMPLING DEVICES WITHOUT SITE-SPECIFIC TESTING
EPA ID No. NMD083212332**

Dear Mr. Martinez:

The Environmental Protection Agency (EPA) and the New Mexico Environment Department (NMED) have reviewed the letter dated April 7, 2016 that was submitted by S. S. Papadopoulos & Associates, Inc. on behalf of Sparton Technology, Inc. (Sparton). Sparton requested that the use of passive sampling devices be approved by EPA and NMED without the need for site-specific testing.

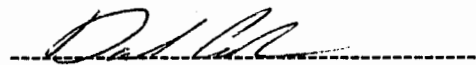
Given the variability in groundwater conditions used in the examples of previous passive sampling events, and in particular the presence of metals, ie. Chromium, as a contaminant of concern at Sparton, EPA and NMED are requiring the use of site-specific testing as described in our February 5, 2016 letter. Two sampling events using passive sampling devices shall be performed using a representative suite of 16 monitoring wells for each event in order to perform a statistically valid comparison. Sparton shall propose which 16 monitoring wells to sample using passive sampling devices prior to the event. The EPA and NMED must approve of the

Mr. Martinez
September 21, 2016
Page 2

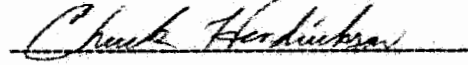
monitoring well selection prior to the start of the comparison sampling. The same 16 monitoring wells shall be used in each event. After the first sampling event, Sparton shall compare the new methodology results to historic results and submit the analysis to the EPA and NMED for review within 60 days of receipt of the laboratory analytical results. The comparison of results from both events must be provided in the annual Groundwater Monitoring Report.

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

Cary B. Wood, President, Sparton Technology, Inc.,
425 North Martingale Road, Suite 2050, Schaumburg, IL 60173

Charles Easterling, OCCAM EC,
6100 Seagull Street NE B203, Albuquerque, NM 87109

James B. Harris, Attorney, Thompson & Knight LLP,
1722 Routh Street, Suite 1500, Dallas, TX 75201-2533

Stavros S. Papadopoulos, S. S. Papadopoulos & Associates, Inc.
7944 Wisconsin Ave., Bethesda MD 20814-3620