



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968

(505) 984-0020

TONY ANAY
GOVERNOR

DENISE D. FC
DIRECTOR

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 26, 1985

Mr. R.P. Mico
Vice President and General Manager
SPARTON TECHNOLOGY, INC.
P.O. Box 1784
Albuquerque, New Mexico 87103

NOTICE OF INCOMPLETENESS

Dear Mr. Mico:

The Environmental Improvement Division (EID) has completed a review of the Closure Plan submitted by Harding Lawson Associates (HLA) on May 7, 1985. This letter is EID's notice that, based on this review, the Closure Plan as submitted is incomplete and/or deficient in many areas. The purpose of this letter is to delineate in writing those areas identified during this review, and require Sparton to submit an amended closure plan addressing those issues. A post-closure plan and permit application submittal is also required.

In addition to EID's comments on the closure plan, some discussion of the infiltration gallery has been included. Please be aware that compliance with the forthcoming corrective action order (3008(h)) will require Sparton's exploration of four different feasible methods of remediation. The applicability of one method above the other three must be defended. Addressing the issues discussed in this letter regarding the infiltration gallery will not necessarily imply EPA/EID's approval of the use of this remedial technique at your facility.

It is the Hazardous Waste Section's opinion that the vadose zone flushing program proposed by HLA would be inadequate to control contamination induced by forcing suspended contaminants into the ground water. Because of the substantial distance to ground water, the possibility of causing lateral dispersion of contaminants in the vadose zone, and the apparent hydrological connection between the upper and lower saturated zone, vadose zone flushing could seriously complicate the present situation. The scope of a program that would conceivably be approved by EPA/EID would require many more recovery wells than are proposed by HLA. The time and degree of treatment required to restore the intentionally contaminated ground water to an acceptable limit would be greater than that needed to restore the contaminated ground water as it now exists. The economic

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"D. Vadose Zone Rehabilitation"

The results of the numerical modeling must be included and assigned a time of 0.

In accordance with Section 206.C.2.c.(4) you have 30 calendar days from receipt of this notice to provide documentation that the afore-mentioned closure/post-closure issues have been addressed. This documentation should include a copy of the revised closure plan with a proposed year of closure, and a post-closure plan.

Section 301.A. requires that any hazardous waste disposal unit that closes after January 26, 1983 obtain a permit during the post-closure care period. A surface impoundment that has not contributed to ground-water contamination may be excluded from this requirement provided that all hazardous waste and hazardous waste residues have been removed. If ground-water contamination does exist, it is highly improbable that "clean-closure" can be accomplished and the facility would be required to have a post-closure permit. Regardless of Sparton's choice of closure methods, the existence of ground-water contamination would require the submission of a post-closure permit application (as previously requested in EID's letter dated June 14, 1985) within 6 months of receipt of this notice. A "Post-Closure Permit Application Checklist" detailing what would be required in your application has been enclosed as guidance. Financial assurance for post-closure care must also be established.

If you fail to submit a revised closure plan that meets EID's approval within 30 days, EID will modify the existing closure plan pursuant to Section 206.C.2.c.(4). Upon receipt of this modified version, the closure schedule will be activated accordingly.

If you have any questions regarding this notice, please contact Ms. Alice Barr, Hazardous Waste Section, New Mexico Environmental Improvement Division, P.O. Box 968, Crown Building, Santa Fe, New Mexico 87504 or call (505) 984-0020 ext. 340. Please also address to Ms. Barr's attention the information you provide in response to this letter.

Sincerely,



Peter H. Pache
Program Manager
Hazardous Waste Section

PHP:AB:mt

Enclosure

cc: Susan Stark, EPA Dallas
Jamie Wright, EPA, Dallas
Kent Bostick, EID, Ground Water Section
Richard Witzelfelt, EID, District I
Duff Westbrook, EID, Legal
Tom Burger, Harding Lawson Associates

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