

SPARTON

SPARTON TECHNOLOGY

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May 9, 1995

HAND DELIVERED

Mr. Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
525 Camino De Los Marquez
Post Office Box 26110
Santa Fe, New Mexico 87502-6110



Re: Sparton Technology, Inc. ("Sparton") - Post Closure Permit
Application - Administrative Completeness Review
("NMDO83212332")

Dear Mr. Garcia:

This letter is Sparton's response to your letter dated March 31, 1995 concerning the above referenced subject. We enclose revised pages to the application containing responses to items 1, 4, 8, 9, 14, and 15 of your form entitled "Administrative Completeness Review Notice of Deficiency" ("Notice").

Each of the other items listed in this Notice deal with matters that are addressed in Sparton's Corrective Measure Study Report ("CMSR") which has been submitted to EPA and is currently under review by EPA pursuant to the consent order between Sparton and EPA dated October 1, 1988 ("Consent Order").

As stated in Metric Corporation's February 15, 1995 cover letter submitting the application for administrative review, Sparton has still not received the comments of EPA

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on the CMSR; consequently, Sparton is unable to give you a time deadline for completing the application to incorporate those matters which are subject to the Consent Order.

Sparton will continue to keep you informed concerning the status of EPA action.

If you have any questions, please contact me.

Very truly yours,

By Richard D. Mico
Richard D. Mico
Vice President & General Manager
Sparton Technology, Inc.

cc: Jan Appel, General Counsel, Sparton
Richard L.C. Virtue, Taichert, Wiggins, Virtue & Najjar
Pierce Chandler, Black & Veatch
Gary Richardson, Metric Corporation

encl.

RDM:ld

PRELIMINARY
RCRA POST-CLOSURE PERMIT APPLICATION
FOR ADMINISTRATIVE REVIEW
FOR
SPARTON TECHNOLOGY, INC., COORS ROAD PLANT
ALBUQUERQUE, NEW MEXICO

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Richard D. Mico

Richard D. Mico, Vice President and General Manager
Sparton Technology, Inc.

Date: 5/8/95

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accordance with the Safe Drinking Water Act, and are outlined in FIGURE 17, page 50, of the draft Corrective Measures Study Report.

3.7.5 Proposed Groundwater Monitoring System [40 CFR 270.14(c)(7)(v)]

To be provided after determination of a corrective action program under the EPA consent order dated October 1, 1988.

3.7.6 (Revised 5-10-95) Statistical Data Evaluation [40 CFR 270.14(c)(7)(vi)]

In conferral with USEPA, Region VI, the statistical analysis technique proposed for use in determining the adequacy of groundwater cleanup measures at the Sparton facility is proposed to be GRITS/STAT v4.2 (Groundwater Information Tracking System with Statistical Analysis Capability). This procedure and format has been developed by USEPA, Region VII, and is documented in EPA/625/11-91/002, November 1992.

3.8 Corrective Action Program [40 CFR 270.14(c)(8)]

To be provided after determination of a corrective action program under the EPA consent order dated October 1, 1988. The Corrective Action Program is currently being developed in conjunction with the USEPA, Region VI, under the consent order.

3.8.1 Characterization of the Contaminated Groundwater [40 CFR 270.14(c)(8)(i)]

Characterization of the contaminated groundwater has been previously summarized under Section 3.7.2 and is also presented in the Corrective Measures Study Report (Section III.B.).

3.8.2 Concentration Limits for Hazardous Constituents [40 CFR 270.14(c)(8)(ii)]

Concentration limits for hazardous constituents have been previously outlined under

Section 3.7.4.

3.8.3 Recommended Corrective Action [40 CFR 270.14(c)(8)(iii)]

To be provided after determination of a corrective action program under the EPA consent order dated October 1, 1988.

3.8.4 Adequacy of the Corrective Measure [40 CFR 270.14(c)(8)(iv)]

To be provided after determination of a corrective action program under the EPA consent order dated October 1, 1988. The Corrective Action Program is currently being developed in conjunction with the USEPA, Region VI, under the consent order.

3.9 (Revised 5-10-95) Additional Commitments

3.9.1 Semi-annual Reporting [40 CFR 264.100(g)]

Sparton will report, in writing on a semi-annual basis, on the effectiveness of the corrective action program.

3.9.2 Facility Contact [40 CFR 264.118(b)(3)]

During the post-closure care period, the contact for the Sparton Coors Road Plant hazardous waste facility will be as follows:

Mr. Richard D. Mico, Vice President and General Manager
4901 Rockaway Blvd. SE
Rio Rancho, New Mexico 87124-4469
(505) 892-5300

3.9.3 Compliance With Other Applicable Federal Laws [40 CFR 270.3]

Sparton's technical consultant has reviewed the Wild and Scenic Rivers Act, National Historic Preservation Act, Endangered Species Act, and Fish and Wildlife Coordination Act and believes that these acts do not apply under existing conditions.

4.0 **SOLID WASTE MANAGEMENT UNIT CLOSURE** [40 CFR 270.14(d)]

The Sparton Coors Road Plant facility operation produced two waste streams: an aqueous metal plating waste stream and a spent solvent waste stream. The aqueous plating wastes were stored on site in one of two adjacent lined ponds approximately nineteen feet by twenty-eight feet in surface dimension and approximately five to six feet deep. The spent solvent waste was stored in a sump approximately five feet by five feet and two feet deep. The ponds and sump were periodically emptied by vacuum truck for off-site disposal at a permitted facility.

The solvent sump was removed from service in October 1980 and the solvent waste stream diverted to drums stored in a "less-than-ninety-day" on-site storage area. All residues in the sump were removed and the sump was then backfilled to prevent water accumulation and/or continued use.

The metal plating waste ponds were removed from service in 1983 and all waste residues were removed. The metal plating waste stream was diverted to a "less-than-ninety-day" on-site drum storage area.

Final pond and sump closure was completed in December 1986 under a state-approved closure plan, ATTACHMENT 5. Sparton had worked closely with the New Mexico Environmental Improvement Division (NMEID) since 1983 to investigate possible releases from the Solid Waste Management Units (SWMU's) and to develop a final closure plan for the units. The state-approved closure plan included removing the ponds and sump

and capping the entire pond/sump area with an asphaltic concrete cap approximately seventy feet by ninety feet in areal extent to eliminate surface infiltration.

5.0 REFERENCES

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