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GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6033
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 22, 2001

Mr. Richard D. Mico
Vice President
Sparton Technology, Inc.
4901 Rockaway Boulevard, SE
Rio Rancho, NM 87124-4469

**RE: REQUEST FOR SUPPLEMENTAL INFORMATION
REVISED RCRA POST-CLOSURE PERMIT APPLICATION
SPARTON TECHNOLOGY, INC.
EPA ID # NMD083212332
HWB-ST 01-002**

Dear Mr. Mico:

The Hazardous Waste Bureau (HWB) of the New Mexico Environment Department (NMED) has reviewed the Revised RCRA Post-Closure Permit Application submitted to the HWB on September 5, 2000. HWB has made a determination that additional information is required prior to granting technical adequacy pursuant to 20.4.2.201.3.2 NMAC. Please respond to the RSI within thirty (30) days of receipt of this letter.

Corrective action requirements specified under 40 CFR Part 264, Subpart F, are being implemented under Consent Decree CIV 97 0206 LH/JHG and will not be included in the Post-Closure Permit Application.

Please supply the following information.

1. Section III, subsection A lists the address of Sparton Technology as being 9621 Coors Road NE whereas Page 3 of the Part B permit application lists the facility as being 9621 Coors Road NW. Please identify the correct address.

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2. Section X, subsection A, of RCRA Part A Permit Application: Code missing regarding permit type.
3. Scale drawings showing past, present and future treatment areas, including the Off-Site Containment and Source Containment Systems, and facility photographs need to be included in the Permit Application pursuant to §270.13(h).
4. Section XII of the RCRA Part A Permit Application; Process Codes and Design Capacities. In accordance with §270.13(i) this section needs to be updated to include all current treatment processes at the Facility, including the SVE system, Off-Site Containment, and Source Containment Systems, and their respective design capacities.
5. Section XIV of the RCRA Part A Permit Application; Description of Hazardous Wastes. In accordance with §270.13(j), descriptions of the hazardous wastes treated at the site, and the processes used to treat those wastes need to be included in this Section.
6. Section X of the RCRA Part A Permit Application; Other Environmental Permits. In accordance with §270.13(k)(9), this section needs to be updated to include a list of all new and existing relevant permits, which includes state permits.
7. §270.13 (l) references a topographic map extending one mile beyond property boundaries. Topographic maps supplied extend up to approximately 2500 feet beyond property boundaries. The map needs to include all referenced information in §270.13(l).
8. Section 2.4 of the Revised RCRA Post Closure Care Permit Application; Security. It is recommended that additional security provisions be included for the Source Containment System currently under construction and the Off-Site Containment System. These additional security measures should also be included in Attachment 6, Post Closure Plan, of the Revised RCRA Post Closure Care Permit Application.
9. §264.15(b)(2) references that a written schedule of inspections needs to be kept at the Facility. A statement referencing this citation needs to be included in Section 2.5 of the Revised RCRA Post Closure Care Permit Application. In addition, this statement needs to indicate that the schedule of inspections and the inspection records will be kept at Sparton Technology, Inc., 4901 Rockaway Blvd. SE, Rio Rancho, New Mexico 87124-4469 instead of at the Facility.
10. §264.15(d) states that inspection records need to be kept for a minimum of three years. Please include this statement in Section 2.5 of the Revised RCRA Post Closure Care Permit Application.

11. Section 2.5 of the Revised RCRA Post Closure Care Permit Application; Inspection. The first paragraph mentions a semi-annual inspection of the surface impoundments whereas the checklist indicates quarterly inspections. Please clarify the frequency of inspections. NMED recommends revising the inspection checklist to include the Off-Site Containment System, Source Containment System, the capped old and new drum storage areas, and all related systems. The inspection checklists should also include specific monitoring wells as opposed to the general term "monitoring well", due to the form not indicating which monitoring well is being inspected.
12. Section 2.6, Preparedness and Prevention, of the Revised RCRA Post Closure Permit Application needs to be included in accordance with §270.14(b)(6) referencing §264 Subpart C. The Source Containment System, Off-Site Containment System, and all related appurtenances are stipulated as part of the Facility and as such, need to have Preparedness and Prevention addressed in the Permit Application. Emergency equipment at the Facility, testing and maintenance of equipment, and arrangements, if any, with local authorities need to be included in this Section.
13. In accordance with §264.118(b)(1), the planned monitoring activities pursuant to Subpart F, §§264.91 through 264.100, the Corrective Action Program, stipulated in the Consent Decree needs to be referenced as such in the Post Closure Plan located in Attachment 6 of the Revised RCRA Post Closure Care Permit Application.
14. §264.118(b)(2)(i) and (ii) need to be addressed in the Post Closure Plan of the Revised RCRA Post Closure Care Permit Application. The planned maintenance activities should include the surface impoundments as well as the Source Containment System, Off-Site Containment System, and all related appurtenances.
15. A current post closure cost estimate needs to be submitted for approval in accordance with §264.144 and the Consent Decree. The previous cost estimate submitted was dated February 16, 2000.
16. In accordance with §270(b)(19)(x), (xi), and (xii), Map 1 needs to be updated to reflect all treatment systems, including the Off-Site Containment System, Infiltration Gallery, Source Containment System, new security fencing, access control features, associated buildings, and flood control barriers that have been constructed since the Map 1 creation date of 10/31/94.

Referencing §270(b)(19)(ix), Map 2 needs to be updated to show the Source Containment System and Off-Site Containment System containment wells. It is recommended that either the scale of Map 2 be increased to show the Off-Site Containment System wells and infiltration gallery or to supply an additional map showing the requested items.

Additionally, Map 2 needs to be updated with the following information; (1) showing the current extent of the contaminant plume using data obtained from the 2000 Annual Report, and (2) identifying the concentration of the groundwater contaminants in accordance with §270(c)(4)(i) and (ii).

17. Section 3.1 of the Revised RCRA Post Closure Care Permit Application states that the summary of ground water monitoring data is provided in Attachment A of the Consent Decree. Please revise this statement to reflect that the ground water monitoring data is contained in Attachment A of the Consent Decree and in Annual Reports submitted to NMED as stipulated by Attachment D of the Consent Decree.
18. Section 3.2 of the Revised RCRA Post Closure Care Permit Application states that this requirement is related to corrective action addressed in the Consent Decree. Please revise this statement to reflect that the aquifer identification data is contained in Attachment A of the Consent Decree and in Annual Reports submitted to NMED as stipulated by Attachment D of the Consent Decree.
19. Sections 3.4 through 3.6 of the Revised RCRA Post Closure Care Permit Application should be revised to state that the respective information is contained in Attachment A of the Consent Decree and in Annual Reports submitted to NMED as stipulated by Attachment D of the Consent Decree.
20. Sections 3.7 and 3.8 of the Revised RCRA Post Closure Care Permit Application should be revised to state that the respective information is contained in Attachments A, C, E, F, and G of the Consent Decree and in Annual Reports submitted to NMED as stipulated by Attachment D of the Consent Decree.
21. In accordance with §270(d)(1)(iii), the dimensions of the old and new drum storage areas need to be supplied in Section 4.0 of the Post Closure Care Permit Application.
22. Appendix A to Attachment 3, Pond and Sump Area Closure, appears to be missing from Attachment 5 of the Revised RCRA Post Closure Care Permit Application.
23. Additional soil sampling of the old drum storage area should be performed to further characterize the site in preparation for clean closure. This sampling should include analyses for VOCs and SVOCs per 40 CFR 261 Appendices III and VIII. During the active life of this site, solvents were stored in the area but no soil samples were taken to analyze for VOCs and SVOCs. Analyses for RCRA metals and pH were performed in 1986 with two samples exceeding the New Mexico Soil Screening Levels for Lead.

If previous soil sampling for VOC's and SVOC's was performed, the results of that sampling event may be submitted for review in lieu of the above request.

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If you have any questions please contact me at the address above or by telephone at (505) 841-9033.

Sincerely,



Robert Warder
Project Leader
Permits Management Program

cc: James P. Bearzi, NMED HWB
John E. Kieling, NMED HWB
Will Moats, NMED HWB
Cindy Abeyta, NMED HWB
~~Pam Allen, NMED HWB~~
Ana Marie Ortiz, NMED OGC
David Neleigh, EPA Region 6 (6PD-N)
Michael Hebert, PE, EPA Region 6

