

State of New Mexico  
ENVIRONMENT DEPARTMENT



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PETER MAGGIORE  
SECRETARY

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

December 5, 2001

Mr. Charles Stranko  
Vice President & General Manager  
Sparton Technology, Inc.  
4901 Rockaway Boulevard, SE  
Rio Rancho, NM 87124-4469

**RE: OLD DRUM STORAGE AREA CLEAN CLOSURE PROPOSAL  
SPARTON TECHNOLOGY, INC. NMD083212332  
HWB-ST 01-001**

Dear Mr. Stranko:

This letter is written in response to Sparton Technology's, Inc. (Sparton) recent inquiry, regarding the possibility of clean closing the Old Drum Storage Area. The New Mexico Environment Department (NMED) is amenable to allowing clean closure of the Old Drum Storage Area, provided Sparton submits an approvable clean closure plan to the Hazardous Waste Bureau (HWB) that is one of the alternatives set forth below. The performance of either of the two alternatives below will demonstrate clean closure of the Old Drum Storage Area if approved by NMED.

Alternative 1:

Sparton shall remove the existing concrete cap over the Old Drum Storage Area and remove the soil covering the area, which is approximately 15 feet by 60 feet, to a depth of twelve (12) inches. Removal of the top 12 inches of the soil will ensure that the soil with the highest concentrations of lead will be removed as noted in the soil sampling data. Sparton shall perform soil characterization tests to ensure that the soil is not hazardous.

Alternative 2:

Sparton shall remove the existing concrete cap over the Old Drum Storage Area. After removal of the concrete cap, Sparton shall visually inspect the soil underlying the concrete cap to ascertain whether significant amounts of elemental

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lead are present in the soil. If visual indications of lead are present then Sparton shall proceed as outlined in Alternative 1. If there is no visual indication of lead present in the soil, Sparton shall perform soil testing in the area to ensure there are no hazardous waste metals present at levels deemed to be harmful to human health or the environment. Four soil samples shall be taken in four equal areas of the overall site. The analysis of these samples shall be for RCRA metals in accordance with EPA SW-846 test method 6010B. If any of the results of the tests show levels greater than 200 mg/kg, further remediation measures will be required at the site.

Should Sparton decide to proceed with one of the closure alternatives above, Sparton will need to respond by submitting a proposed work plan, in the form of a letter, setting forth in detail its clean closure alternative. The plan should also include a schedule of proposed events and any other relevant details necessary to carry out the work.

After receiving Sparton's submittal, NMED will review it and provide comments or conditions and a written approval of the proposed work plan, if it meets all the elements set forth in one of the alternatives. After the work is accomplished a closure report shall be submitted by Sparton indicating the work performed, applicable sampling data, and any deviations to the approved work plan. NMED will review and provide comments and/or approval of the closure report.

Completion of the closure requirements under an approved plan and an approved closure report, supporting the clean closure of the Old Drum Storage Area, prior to December 31, 2001, will remove the Old Drum Storage Area from Annual Unit Audit for Calendar Year 2002. Additionally, if an approved closure is accomplished in the immediate future, the Old Drum Storage area will not need to be addressed in the Post-Closure Care Permit however, the Post Closure Care Permit Application will need to be updated to reflect clean closure of the Old Drum Storage area.

Should you have any questions regarding this subject please contact Robert Warder of my staff at (505) 841-9033.

Sincerely,



John E. Kieling  
Program Manager  
Permits Management Program

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cc: James Bearzi, NMED HWB  
Will Moats, NMED HWB  
Robert Warder, NMED HWB  
Ana Marie Ortiz, NMED OGC  
Steve Hattenbach, NMED OGC  
James B. Harris, Sparton Technology, Inc. Attorney  
Gary Richardson, Metric Corporation  
David Neleigh, EPA Region 6 (6PD-N)  
Michael Hebert, EPA Region 6

File: Red ST 01-001, Reading File