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Sparton
Permit Renewal
Application
Attachment L

SPARTON TECHNOLOGY INC.

COORS ROAD FACILITY

SOURCE CONTAINMENT SYSTEM

OPERATION AND MAINENTANCE MANUAL

PREPARED FOR

SPARTON TECHNOLOGY INC.

RIO RANCHO, NEW MEXICO

PREPARED BY

METRIC CORPORATION

ALBUQUERQUE, NEW MEXICO

FEBRUARY 2003

UPDATED BY

S.S. PAPADOPULOS & ASSOCIATES, INC.

BETHESDA, MARYLAND

NOVEMBER 2014

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INTRODUCTION

During 2001 Sparton Technology, Inc. installed and tested the Source Containment System located on the Coors Road property in Albuquerque, New Mexico. The system was placed into operation on January 3, 2002. The Source Containment System was installed, tested and is operated in accordance with Attachment F (Work Plan for the installation of a Source Containment System) to the Consent Decree, entered on March 3, 2000.

The Source Containment System consists of a containment well (CW-2), a water treatment building, and a series of rapid infiltration ponds as shown on Figure 1. The objective of the Source Containment System is to (a) create a capture zone that contains on-site source areas and thereby prevents the off-site migration of most contaminants originating at the site, and (b) recover contaminated groundwater for treatment and return to the aquifer (see Figure 1). The Source Containment System works in conjunction with an Off-Site Containment System, which extracts groundwater from near the leading edge of the groundwater plume. Operations and maintenance of the Off-Site Containment System are described in a separate document.

CONTAINMENT SYSTEM DESCRIPTION

The source containment well (CW-2) and the associated water treatment facility are located at 9621 Coors Road NW, Albuquerque, New Mexico. The containment well is 130 feet deep and is equipped with 4 ½- inch outer diameter (o.d.) casing and a 7.5 horse-power (hp) Myers submersible pump, as shown on Figures 2 and 3. The submersible pump control panel is located within the water treatment facility. The submersible pump is capable of producing up to 75 gallons per minute (gpm) from the containment well. Well and submersible pump literature are contained in Attachment A.

The water treatment building, shown on Figure 1, houses an air stripper and associated equipment, which removes chlorinated solvents from the groundwater. The As-Built plans for the water treatment building and copies of the final inspection sign-off tags for the building are contained in Attachment B.

In April 2014, an ion exchange system was installed upstream of the air stripper in order to remove chromium from the groundwater. The system, which is rented from Evoqua Water Technologies, consists of a bag prefilter and a series of two 30-cubic-foot tanks containing anion exchange resin. The influent piping manifold is designed to allow a portion of the influent from CW-2 to be diverted through the ion exchange system for chromium removal. The effluent

from the chromium removal system is then combined with the untreated portion of the influent, and the combined flow is routed through the air stripper for volatile organic compound (VOC) treatment. The portion of the chromium-treated influent is periodically adjusted to ensure that the air-stripper effluent meets the New Mexico Water Quality Control Commission chromium standard of 0.050 mg/L for groundwater. Literature for the ion exchange system is contained in Attachment L.

The air stripper, housed in the water treatment building is an EPG model STAT 180. It is designed to treat up to 75 gpm of water containing up to 5,000 parts per billion (ppb) of trichloroethene (TCE) to below 5 ppb. Air stripper literature is contained in Attachment C.

The water treatment system includes a 550 gallon polyethylene chemical feed tank and a chemical metering pump which injects AQUA MAG (a sodium ortho/polyphosphate blend) into the flow at the inlet to the air stripper. AQUA MAG is injected at a rate of 1.24 parts per million (ppm) phosphate to inhibit precipitation of calcium carbonate in the air stripper and piping. Chemical feed pump literature is contained in Attachment D.

Effluent from the air stripper system is discharged into the rapid infiltration ponds (Figure 1). The water placed in the rapid infiltration ponds travels vertically through the vadose zone back into the aquifer. Original as-built plans for the rapid infiltration ponds are presented in Attachment E. Since the original construction, Ponds 1, 4, 5 and 6 have been closed as the two remaining ponds (Ponds 2 and 3) provide sufficient capacity for infiltration of the maximum design discharge rate.

The Source Containment System is equipped with numerous safeguards to prevent release (to the surface or to the aquifer) of untreated groundwater. The main air stripper panel will shut off the submersible pump in well CW-2 if any of the following conditions occur:

- Low blower pressure resulting from electrical or mechanical failure of the air stripper blower.
- High air stripper sump level resulting from misadjustment of the discharge valve, or discharge pump failure.
- High building sump level resulting from a large leak in the air stripper or piping within the building. The building sump has a capacity of about 2,300 gallons, which is about three times the maximum amount of water contained in the air stripper at any time.
- High water level in ponds caused by clogging of the pond bottoms.
- High well-pit level.

- Low chemical feed tank level.

When any of the above described or other conditions shuts off the submersible pump in well CW-2, the air stripper blower will subsequently shut off after a time delay to allow the water in transit in the air stripper to be treated. The submersible pump panel includes a flow switch to shut off the submersible motor if the pump fails or if a valve is closed.

The Campbell Scientific CR800/COM310 monitoring system (Figure 7) will notify maintenance personnel immediately any time the submersible pump shuts off, via a telephone link. The designated maintenance person will travel to the system location, evaluate the reason for the shutdown, make arrangements to rectify the problem and restart the Source Containment System.

The air stripper panel controls are described in Attachment C. The Campbell Scientific CR800/COM310 monitoring system is described in Attachment F.

OPERATING PERMITS AND REPORTING REQUIREMENTS

The Source Containment System is operated within the requirements of three permits.

The operation of containment well CW-2 is conducted under New Mexico Office of the State Engineer permit number RG-73531-T. The permit allows diversion of up to 121 acre-feet per annum, and consumptive use of up to 15 acre-feet per annum is allowed. The permit requires that the amount of water diverted from the well be submitted to the Office of the State Engineer on or before the 10th day of each month for the preceding calendar month. New Mexico Office of the State Engineer permit RG-73531-T and supplemental information is contained in Attachment G.

The operation of the air stripper is conducted under Albuquerque/Bernalillo County Authority-to-Construct Permit No. 1203 (see Attachment H). The permit allows operation of containment well CW-2 at a rate of up to 75 gpm. The air emission limits are as follows:

Total VOC Rates: 0.22 pounds per hour (lbs/hr)

0.99 tons per year (tpy)

Hazardous Air Pollutant Concentrations:

Trichloroethylene: 77 milligrams per cubic meter (mg/m^3)

1,1,1-Trichloroethane: 8 mg/m^3

1,1-Dichloroethylene: 8 mg/m^3

Operation of the rapid infiltration ponds are conducted under New Mexico Environment Department Discharge Plan Approval DP-1184 which is renewed every five (5) years. A copy of the most recent renewal of the permit is presented in Attachment I. The permit allows discharge of up to 108,000 gallons per day (gpd) of treated groundwater to the rapid infiltration ponds (see Figure 1). The discharge plan approval requires monthly sampling and analysis of the air stripper effluent and quarterly monitoring of three monitoring wells (MW-17, MW-77, and MW-78 at locations shown in Figure 1) associated with the ponds.

OPERATIONAL RESPONSIBILITIES

Operation and Maintenance of Source Containment System is the responsibility of the Corporate EHS Manager of Sparton Technology, Inc. (Mr. Ernesto Martinez, 386-490-5811). Day-to-day operation of the system, as well as operation and maintenance problems are assigned to Easterling Consulting LLC, of Albuquerque, New Mexico (Mr. Chuck Easterling, 505-821-6646, or, Mr. Joe Sandoval, 505-321-1830), under subcontract with S.S. Papadopulos & Associates Inc., Bethesda, Maryland.

NORMAL OPERATION

Normal Startup Procedure

If the system was deliberately shut down, the following procedure should be used to start the system:

Main Air Stripper Panel

- Main Disconnect - On
- Alarm Reset - Press
- Discharge Pump HOA Switch - Auto
- Air Stripper Blower HOA Switch - Auto
- Submersible Pump HOA Switch - Auto

Within 10 seconds of placing Submersible Pump HOA Switch in Auto position, the following must be performed:

Submersible Pump Panel

- Main disconnect – On
- HOA Switch – Hand
- Start Switch – Press

Other

- Check total flow rate and rate of flow diverted to the chromium removal system and adjust, if necessary, to the applicable specified rates

Normal Shutdown Procedure

To shut the system down for maintenance or repairs, the following procedure should be used.

Main Air Stripper Panel

- Submersible Pump HOA Switch – Off

The submersible pump in well CW-2 will stop, the stripper blower will continue to run for 1 or 2 minutes and then it will stop, and the discharge pump will continue to run until the air stripper sump is pumped down to the low level float and then it will stop.

Each time the water treatment building is visited for performance of scheduled or unscheduled tests, the activities performed should be documented on CW-2 Operation Log forms provided in Attachment J.

Tasks Performed One Time per Week

- Read and record blower air pressure. It should be between 25 and 30 inches of water (Gauge 6). If it is outside these limits, identify and remedy the problem.
- Read and record the pressure reducing valve inlet and outlet pressures (Gauges 8 and 9). The outlet pressure should be between 5 and 10 pounds per square inch (psi). If it is outside these limits, identify and remedy the problem.
- Read and record the time and the cumulative water meter (Gauge 10) readings. It is important to record the time at the moment the cumulative water meter is read.
- With a stopwatch, measure the time, in seconds, required for one revolution (100 gallons) of flow on the accumulative water meter. Calculate the instantaneous flow using the following equation:

$$\frac{6{,}000}{Time\ in\ \sec for\ one\ revolution} = flow\ (gpm)$$

The flow should be between 49 and 51 gpm. If it is not, adjust the inlet valve located just above the pressure reducing valve.

- Read and record the flowmeter for flow diverted to the chromium treatment system. Make adjustments to the flow rate, if required. If a decline in flow rate is observed and this decline is attributed to the chromium system prefilter, replace the filter.
- Measure and record the time required for the water level in the sight glass on the air stripper to drop one inch with the discharge pump running. The time should be between 1 and 2 minutes. If it is not, adjust the outlet valves leading to the rapid infiltration ponds.
- Measure and record the volume of AQUA MAG solution remaining in the chemical feed tank by interpolating between 100 gallon increments marked on the tank. If the volume remaining is less than 200 gal, mix more solution. The mixture is as follows:

  4.1 gal AQUA MAG/100 gal solution

  Water to mix the solution is treated water obtained from the air stripper discharge via the PVC piping which enters the top of the chemical feed tank.

- Calculate and record the volume of AQUA MAG solution consumed per day between the two most recent chemical feed tank volume measurements using the following equation:

$$\frac{(tank\ volume\ between\ the\ measurements)\ x\ 24}{(time\ in\ hours\ between\ measurements)} = volume\ of\ solution\ consumed\ per\ day$$

- The system should consume between 10 and 12 gal/day of AQUA MAG solution. If the consumption is not within these limits, identify and remedy the problem. Small variations can be remedied by adjusting the chemical feed pump.
- Record the quantity of pure AQUA MAG on hand. If the quantity is less than 55 gal, order additional. AQUA MAG is available from

  Treatment Technology, Inc.
  P.O. Box 668
  Evergreen, CO 80437-0668
  (303) 670-3936

- Sample the chromium treatment system at the following locations: (a) influent; (b) between ion exchange tanks; (c) effluent from the second tank; and (d) air-stripper

effluent, for chromium analysis. If the weekly chromium sampling coincides with the monthly influent/effluent sampling, sample for chromium only at locations (b) and (c).

- Clean the floor and remove any trash in the building.
- Inspect the outside of the building and fence. If vandalism or damage has occurred, repair as necessary. If the exterior stucco or trompe l'oeil have been vandalized, they can be touched up with Welborn brand Plasterbond exterior paint.
- Perform once a week the "daily inspections" of the chromium removal system as detailed in Section 3 of the Operation and Maintenance Manual in Attachment L.

Tasks Performed One Time per Month

- On the last day of each month (± two days), read and record the accumulative water meter (Gauge 10) for reporting to the New Mexico Office of the State Engineer.
- At the beginning of each month, sample air stripper influent and effluent for VOCs and metal (chromium, iron and manganese) analysis.
- Inspect infiltration ponds, rectify any conditions that require attention; maintain log of the monthly inspections.

Tasks Performed One Time per Quarter

- During February, May, August and November, monitoring wells MW-17, MW- 77, and MW-78 will be sampled and have the water levels measured.
- Shut the system down by turning the submersible pump HOA switch on the Main Stripper Panel to off. Wait for the blower and discharge pump to stop (±5 min). Separate the sir stripper at the joint below the bottom tray and lift all trays about 3 inches using the gantry crane. Inspect, with a flashlight, the bottom tray for calcium carbonate encrustation or other debris. If encrustation is observed in the trays, they should be cleaned with a high pressure washer and a wet/dry vacuum, using the gantry crane in the building, to lift the trays.

Tasks Performed Two Times per Year

- Check flow switch paddle for fatigue cracks.

SYSTEM TROUBLE SHOOTING, REPAIRS, AND SUPPLIES

Startup after Automatic Shutdown

Anytime the system is shut down by the automatic control system or by a power failure, it is absolutely important for the responding technician to follow the following sequence:

- Document the status of the system including all alarms on the Main Stripper Panel (see Figures 4, 5, and 6).
- Document water levels in the air stripper sump, building sump, ponds and chemical feed tank. Document any other potentially relevant or unusual circumstances.
- Determine and document the cause(s) of the shutdown. Table 1 may be helpful in determining the cause(s) of the shutdown.
- Remedy the cause of the shutdown and restart the system.

For assistance with any trouble shooting, repairs or supplies, contact the people outlined in Table 2.

EQUIPMENT REPLACEMENT SCHEDULE

A maintenance schedule is presented in Table 3 for major equipment items including the extraction well, submersible pump, the air stripper, blower motor, discharge pump, and infiltration ponds.

WASTE MANAGEMENT

Waste generated by the Source Containment System will be handled as follows:

- AQUA MAG Drums - These will be cleaned and reused for collection of spent materials at Sparton's Rio Rancho facility.
- Trash - This will be placed in the dumpster at the Melloy Dodge facility.
- Calcium Carbonate Encrustation - This material will be accumulated in a plastic bucket and analyzed for TCLP - chromium and TCLP - 8260. If the material does not exceed TCLP standards, it will be dried and placed in the dumpster at Sparton's Rio Rancho Facility. If the material exceeds TCLP standards it will be handled by a licensed waste transportation and disposal vendor.
- Inoperable Equipment - Any inoperable equipment which has come in contact with untreated groundwater including submersible pumps, discharge pumps, and water piping will be steam cleaned in the air stripper building prior to leaving the site.

- Decontamination and Purge Water - Water resulting from decontamination of equipment or purging of monitoring wells is discharged to the building sump and pumped to the inlet side of the air stripper by the sump pump for treatment by the air stripper.
- Well Redevelopment Waste Water - This will be decanted and neutralized at the site and treated through the air stripper.

CONTINGENCY PLANS

Should monthly air stripper effluent testing indicate that the stripper efficiency is declining; the stripper will be cleaned and repaired as necessary to maintain the treatment efficiency.

Should weekly water level measurements in the rapid infiltration ponds indicate they are clogging; provisions will be made to clean the ponds.

Should unforeseen operational issues or problems arise, these will be defined, solutions will be developed, and this plan will be revised as necessary.

HEALTH AND SAFETY PLAN

A health and safety plan for operation of the Source Containment System is contained in Attachment K.

NEW MEXICO
ENVIRONMENT DEPARTMENT

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Santa Fe, New Mexico 87505-6303
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SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Pending

Mr. Robert Frank
President
University of New Mexico
MSC05 3300
1 University of New Mexico
Albuquerque, NM 87131

RE: NOTICE OF VIOLATION WITH PROPOSED PENALTIES
UNIVERSITY OF NEW MEXICO
EPA ID# NMD980621197

Dear Mr. Frank:

On March 23-24, 2016, the New Mexico Environment Department (NMED) conducted a hazardous waste Compliance Evaluation Inspection at the University of New Mexico (UNM), located at 1 University of New Mexico, Albuquerque, NM. Based on that inspection and review of the information obtained, NMED has determined that UNM is a Large Quantity Generator as defined in the Notification of Regulated Waste Activity Instructions (EPA Form 8700-12) and has violated the New Mexico Hazardous Waste Management Regulations (20.4.1 NMAC) as specified below.

NMED inspectors observed the following violations:

1. Failure to conduct waste determinations on the following wastes:
    a. Item 82, 129, 232, 478, 479, and 502 as well as "Chemically Contaminated Sharps" on the Hazardous Materials Disposal Request from dated 2/16/16
    b. Cuda Aqueous Brake Cleaner sludge in Automotive Center
    c. Chemistry Bldg, Room 112 black containers under hood
    d. Chemistry Bldg, Room 207 numerous containers
    e. Farris Building, Room 57 unknown chemicals in refrigerator and freezer
    f. Farris Building, Room 37A unknown chemicals under sink

g. Farris Building, Room 29 unknown chemicals under hood
h. Expired pharmaceuticals in Student Health & Counseling Pharmacy
i. Spent parts washer solvent at the North Golf Course garage
j. Expired pharmaceuticals in the Innovation & Technology Center-EMS Academy
k. Castetter Hall, Room 153, 500ml container; Room 205, 500ml container; and Room 243
l. Centennial Hall, Room 1003, contaminated rags; Room 2067 and numerous containers in Room 3058A
m. Dominici Hall, Room 1124, unlabeled solids
n. Shop towels and rags contaminated with solvents used in various locations at UNM
o. Ceramic glaze in the Art Department

This is a violation of 20.1.300 NMAC, referencing 40 CFR § 262.11.

2. Failure to mark accumulation start dates on containers. Specifically, NMED inspectors observed numerous undated containers of various sizes located in chemistry, biology and engineering laboratories and the 90-day storage area. Additionally, hazardous waste located in the 90-day storage area was dated 2/168/16. This is a violation of 20.4.1.300 NMAC, referencing 40 CFR § 262.34(a)(2).

3. Failure to label containers as hazardous waste. Specifically, NMED inspectors observed numerous unlabeled containers of various sizes located in chemistry, biology and engineering laboratories and the 90-day storage area. This is violation of 20.4.1.300 NMAC, referencing 40 CFR § 262.34(a)(3).

4. Failure to label satellite accumulation containers with the words "Hazardous Waste" or other words that identify the contents. Specifically, NMED inspectors observed numerous unlabeled containers of various sizes located in chemistry, biology and engineering laboratories. This is violation of 20.4.1.300 NMAC, referencing 40 CFR § 262.34(c)(1)(ii).

5. Failure to establish a satellite accumulation area "at or near the point of generation" or meet 90-day storage area requirements. Specifically, NMED inspectors observed several locations in the chemistry, biology and engineering buildings in which the hazardous waste was being moved to a centralized location for storage prior to transport to the 90-day storage area. This is a violation of 20.4.1.300 NMAC, referencing 40 CFR § 262.34(c)(1).

6. Failure to conduct annual hazardous waste management training for employees managing hazardous waste. The following employees hadn't had annual training:
    a. Terese Anderson overdue 2 years
    b. Desiree Mora overdue 1 year
    c. Chemanji Shu-Nyamboli seven months late on training 2014-15
    d. Carin Kelley overdue at time of inspection

    This is violation of 20.4.1.600 NMAC, referencing 40 CFR § 265.16(a).

7. Failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste. Specifically, NMED inspectors observed containers that were deteriorated, some with cracked lids, rusty, and leaking. These included a mercury thermometer in the 90-day storage area and containers in the Farris Building, Room 025 and Room 029. This is a violation of 20.4.1.600 NMAC, referencing 40 CFR § 265.31.

8. Failure to maintain hazardous waste containers in good condition. Specifically, NMED inspectors observed several containers in poor condition in the Farris Building, Room 025 and Room 029. This is a violation of 20.4.1.600 NMAC, referencing 40 CFR § 265.173.

9. Failure to conduct weekly inspections. Specifically, UNM failed to conduct weekly inspections of the mixed rad/hazardous waste storage warehouse and in the central chemical storage area in the Biology Building. Additionally, weekly inspections were missed the week of April 14, 2014-May 9, 2014; June 24, 2015-July 9, 2015; and January 27, 2016-Febrary 10, 2016. This is a violation of 20.4.1.600 NMAC, referencing 40 CFR § 265.174.

10. Treating and storing hazardous waste without a permit. Specifically, a NMED inspector observed a hazardous waste container, dated 12/5/15, stored beyond the allowable 90 days for a Large Quantity Generator. Additionally, UNM was treating hazardous waste without a permit. Treatment was occurring in the Biology Building. This is a violation of 20.4.1.900 & 901 NMAC, referencing 40 CFR § 270.1(c).

11. Failure to store universal waste lamps to prevent breakage. Specifically, NMED inspectors observed fluorescent bulbs in several locations around the campus that were not containerized. This is a violation of 20.4.1.1000 & 1001 NMAC, referencing 40 CFR § 273.13(d).

12. Failure to label universal waste containers properly. Specifically, NMED inspectors observed fluorescent bulbs being stored in unlabeled containers. This is a violation 20.4.1.1000 & 1001 NMAC, referencing 40 CFR § 273.14(d).

13. Failure to demonstrate the length of time universal waste has been accumulating on site. Specifically, UNM could not demonstrate the length of time fluorescent bulbs

being stored on site. This is a violation 20.4.1.1000 NMAC, referencing 40 CFR § 273.15(c).

14. Failure to use a mechanical bulb crusher that met the requirements listed in 20.4.1.1001(C)(2)(a) NMAC. UNM had two bulb crushers that did not have documentation that it met the requirements in 20.4.1.1001(C)(2) NMAC.

15. Failure to notify the HWB of the intent to use the two bulb crushers in use at UNM. This is a violation of 20.4.1.1001(C)(3) NMAC.

16. Failure to label the following containers with the words "Used Oil" or other identifying words. Specifically, NMED inspectors observed the following unlabeled containers:
    a) Various laboratories
    b) Two containers in the Automotive Center
    c) One container in the Landscaping Maintenance Shop
    d) Several containers on secondary containment in the 90-day storage area

    This is a violation of 20.4.1.1002 NMAC, incorporating 40 CFR § 279.54(f) and 20.4.1.1003 A NMAC.

17. Failure to have position descriptions for employees managing hazardous waste. Individuals managing hazardous waste should have position descriptions that include the job title, name of employee, requisite skills required for position, and training requirements. This is a violation of 20.4.1.600 NMAC, referencing 40 CFR § 265.16(d).
18. Failure to make arrangements with local authorities. UNM failed to make arrangements with the police, fire department and hospital to familiarize them with the type of waste and layout of the facility.
19. Failure to keep a copy of the Analysis Plan at the facility. Specifically, NMED inspectors requested to review the Analysis Plan but were told it was kept in the Colorado office. This is a violation of 20.4.1.1002 NMAC, incorporating 40 CFR § 279.55.

20. Failure to pay hazardous waste generator fees for 2013 and 2014. This is a violation of 20.4.3.200 NMAC

21. Failure to pay business fees for 2013 and 2014. This is a violation of 20.4.3.400 NMAC.

NMED requires that UNM provide to NMED within (30) days of receipt of this letter a written description of the actions taken by UNM to address the violations described above and a schedule for implementation of corrective actions not yet completed.

In accordance with 74-4-10 NMSA 1978, NMED may: (1) issue a Compliance Order requiring compliance immediately or within a specified time period, or assess a civil penalty for any past or current violations of up to $10,000 per day of non-compliance for each violation, or both; or (2) commence a civil action in District Court for appropriate relief, including a temporary or permanent injunction. Any such order may include a suspension or revocation of any permit issued by NMED.

Due to the nature of the violations listed above and UNM past history of noncompliance with 20.4.1 NMAC, NMED will propose a civil penalty for these violations, which will be sent in a separate letter. If you would like to negotiate the civil penalty, please contact Janine Kraemer, by telephone at 505-476-4372 or by e-mail at Janine.Kraemer@state.nm.us within 10 days of receipt of this NOV to schedule an informal conference concerning resolution of this matter.

Any action taken in response to this letter does not relieve UNM of its obligation to comply with any other applicable laws and regulations. If you have any questions regarding this letter, please contact Janine Kraemer at 505-476-4372 or by email at Janine.Kraemer@state.nm.us. Please address any written response to the attention of Ms. Kraemer at the address in the letterhead.

Sincerely,

John E. Kieling
Chief
Hazardous Waste Bureau

JEK: jk

cc: Janine Kraemer, NMED HWB
Michael Space, NMED HWB
William Chavez, NMED District I Manager

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