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State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ST 95
MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

March 31, 1995

Mr. Richard D. Mico
Vice President and General Manager
Sparton Technologies, Inc.
4901 Rockaway Blvd. S.E.
Rio Rancho, New Mexico 87124-4469

RE: Post Closure Permit Application
Administrative Completeness Review (NMD083212332)

Dear Mr. Mico:

The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) conducted an administrative completeness review of the Sparton Technologies, Inc. (Sparton) Post Closure Permit Application dated February 1995. The application reviewed is for post closure care of hazardous waste management units located at your Albuquerque facility. Based upon our review the application is determined to be administratively deficient. Enclosed is a list of deficiency items that must be addressed by Sparton in order to complete the application. Your response which adequately addresses the enclosed comments is due within thirty (30) days of your receipt of this letter. After receipt of an adequate response the HRMB will deem the application administratively complete and a permit processing fee will be assessed. A technical review of the application will then be initiated.

Please contact Marc Sides at (505) 827-4308 if you have any questions on the enclosed deficiency items.

Sincerely,

Benito J. Garcia, Chief
Hazardous and Radioactive Materials Bureau

Enclosure

cc: Barbara Hoditschek, HRMB Permit Program Manager
David Neleigh, EPA 6H-PN
File - Red

**ADMINISTRATIVE COMPLETENESS REVIEW
NOTICE OF DEFICIENCY**

**Post Closure Permit Application
Sparton Technologies, Inc.
NMD083212332**

1. Page 7 of 7, Part A Application, Attachment 1

This page of the Part A Application needs to be signed and dated by the facility Owner/Operator. An original signature is needed for application filing.

2. Page 14, Section 3.1

A summary of groundwater monitoring data obtained during the interim status period should be provided in the application.

3. Page 19, Section 3.7.5

A description of the groundwater monitoring wells should be given in the application. This includes at a minimum: number of wells; locations; depths and screened intervals; casing description; other well construction details; and identification of upgradient and downgradient wells.

4. Page 19, Section 3.7.6

A description of the statistical procedures to be employed to make the required statistical comparisons should be provided in the application.

5. Attachment 2

A topographic map should display the Point of Compliance.

6. Page 20, Section 3.8.3

The Corrective Action Program should be provided in the application. The Corrective Action Program must be designed to prevent hazardous constituents from exceeding their respective concentration limits beyond the Point of Compliance.

7. Page 20, Section 3.8.4

In conjunction with a Corrective Action Program, a groundwater monitoring program must be implemented to determine compliance with the groundwater concentration limits established under 20 NMAC 4.1 Section 264.94, and to determine the effectiveness of the Corrective Action Program. This information must be provided in the application.

8. Not Addressed in Application

The application should contain a statement that a semi-annual report will be provided to the NMED Secretary evaluating the effectiveness of the Corrective Action Program. Proposed reporting parameters should be provided in the application.

9. Not Addressed in Application

The application should provide the identification and location (address and phone number) of the person(s) responsible for storage and updating the facility copy of the post closure plan during the post closure period.

10. Page 11, Section 2.16.1

A copy of the current Post Closure Cost Estimate prepared in accordance with 20 NMAC 4.1 Section 264.144 should be provided in the application.

11. Page 11, Section 2.16.2

A copy of the established financial assurance mechanism for post closure care adopted in compliance with 20 NMAC 4.1 Section 264.145 should be provided in the application.

12. Attachment 9

The post closure letter of credit with the wording required in 20 NMAC 4.1 Section 264.151(d) should be provided. Attachment 9 does not meet the language requirements of the regulations.

13. Attachment 10

The post closure insurance should be worded as specified in 20 NMAC 4.1 Section 264.151(e).

14. Not Addressed in Application

The application should contain a demonstration of compliance with requirements of other applicable federal laws such as the Wild and Scenic Rivers Act, National Historic Preservation Act, Endangered Species Act, Fish and Wildlife Coordination Act, etc.

15. Page 1

The application must contain an original certification signature. (The signature provided with the initial application is a copy).

16. Page 7, Section 2.5

This section of the application discusses a "semi-annual" inspection. However, Attachment 4 is a "quarterly" inspection checklist. The application should clarify the appropriate sampling frequency proposed. Also the application should state that records of inspection will be kept for a minimum of three years.