

December 7, 1982

Dick Whittington, P.E.
Regional Administrator
USEPA Region VI
1201 Elm St.
Dallas, Texas

Dear Sir;

In response to your letter of November 9, 1982 Rinchem Company, Inc. (EPA ID# NMDO 85267961) is moving rapidly to resolve the violations listed from the April visit. Our progress is as follows;

ITEMS 1 & 2: All containers are being labeled with yellow labels indicating that the contents are hazardous waste and listing the proper shipping name, hazard class, manifest number etc. All drums requiring flammable or corrosive labels are labeled accordingly. If generator does not have the appropriate labels and manifests, Rinchem supplies them.

ITEM 4: The complete site (just over $\frac{1}{2}$ acre) is surrounded by a chain link fence with two 20 foot gates in the front. Gates are locked other than normal working hours and can be seen by employees during business hours. With all hazardous waste in sealed steel drums, we believe the facility would be exempt from posting a guard at the gate by section 265.14a(1) and (2).

ITEM 5: The facility is not in a county bordering Mexico, so spanish signs would not be required under section 265.14c, but signs are now in Spanish and English on all four sides just as extra precaution.

ITEM 8: Stacks of drums are small enough to allow for visual inspection of all drums at all times. Fork lift access to each stack of drums (type of waste) is maintained from one end of each stack. Drums can be readily moved by forklift if a more detailed inspection or repackaging is required.

ITEM 9: A vice president of Heights General Hospital has toured the facility and pre-registered all employees. Rinchem has agreed to notify the hospital and ambulance service by phone of the type of injury and contamination (if any) before employees/patients arrive at the hospital or are picked up at the facility.

ITEM 11: The facility did reconcile the discrepancy immediately with the generator. General Electric had photo copied manifests from previous 30 drum shipments. Because 30 drums were not ready to ship, the generator crossed out the number 30 and entered the number that were actually shipped.

ITEM 13: The facility is only 110 feet from north to south. Drums are 50 feet from all but the north property line. They are separated from it by a 34 foot warehouse building and two cinder block walls 14 feet high. The only other alternative is to close the facility.

ITEMS 3,6,7,10,12 and 14: An operating plan including contingency plan, waste analysis plan, schedule of inspections, training plan, operating record and closure plan has been drafted.

I request an additional 60 days to polish, retype and implement the plan before it is distributed to regulatory and emergency response groups. This will allow time to have a knowledgeable person from New Mexico Environmental Improvement Division or US EPA Region VI review the plan and give me counsel before it is distributed generally.

I am eager to keep the industrial waste transfer station portion of our chemical distribution business safe and in compliance with applicable statutes. I will await your response to our progress.

Sincerely Yours,

A handwritten signature in cursive script that reads "Bill Moore".

Bill Moore
Vice President