RINCHEM
PHONE (505) 345-3655
COMPANY INC.
6133 EDITH BLVD.NE
ALBUQUERQUE NM 87107

RECEIVED
AUG 05 1986
HAZARDOUS WASTE SECTION

August 5, 1986

Mr. Boyd Hamilton
Hazardous Waste Office
N.M. Environmental Improvement Division
Harold Reynolds Building
Santa Fe N.M. 87501

SUBJECT: Part A and B Permit Application

We hereby deliver by hand two copies of the Part A and Part B permit application for Rinchem Company, Inc.

Rinchem is currently in the process of making an official request to your office for permission to become a storage facility for hazardous waste.

If you have any questions on this submittal please refer them to myself. I hope you find this permit application satisfactory.

Sincerely

William Moore
President
Rinchem Company, Inc.

WM/gab

Attachment: (2) Part A and Part B

FEB. 17 1987

**Certification and Signatory**

The following certification and signature are presented to satisfy the requirements of 40 CFR 270.11(d).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering, the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date 12 FEB 87 Signature _____

William W. Moore

President

RECEIVED

AUG 05 1986

HAZARDOUS WASTE SECTION

**Certification and Signatory**

The following certification and signature are presented to satisfy the requirements of 40 CFR 270.11(d).

I certify under penalty of law that I have personnaly examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Date:_____ Signature _____

William Moore

President

See Previous Page.

RINCHEM COMPANY INC.
PHONE (505) 345-3655
6133 EDITH BLVD.NE
ALBUQUERQUE NM 87107

REVISIONS TO PART B HAZARDOUS WASTE PERMIT APPLICATION

FEB 17 1987

**CERTIFICATION & SIGNATORY**

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Each required information item is briefly stated. Regulatory citations are provided which enable quick location of full text of the regulation that contains each required item (if no citation is indicated next to a specific item, the last citation indicated above the item contains the requirement).

Space is provided to record the page numbers where the applicable items can be found in this application. If the item is not applicable to this facility, "N/A" is substituted for the page number.

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| | - Thickness | N/A |
| 264.221(a)(2) | - Foundation design/integrity | N/A |
| 264.221(a)(3) | - Area covered | N/A |
| 264.221(a)(1) | - Liner system integrity against | N/A |
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| | - Installation stresses | N/A |
| | - Daily operational stresses | N/A |
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| | - Nature and quality of wastes | N/A |
| | - Alternative design and operation | N/A |
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| | - Hydrogeologic setting | N/A |
| | - Attenuative capacity of materials between impoundment and groundwater & surface water | N/A |
| | - Documentation of no migration to ground/surface waters at any future time | N/A |
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| 270.18(f) | - Description of treatment carried out in or on the pile including | N/A |
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| 270.20(a) | - Laboratory analysis | N/A |
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| | - Operating data | N/A |
| | - Submittal for laboratory analysis or field test demonstration permit including | N/A |
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| | - Climatologic information | N/A |
| | - Topographic data | N/A |
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| 40 CFR Section | Subject Requirement | Page Number |
|---|---|---|
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| | - Statement on appropriateness of demonstration | N/A |
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| | - Characteristics of wastes to be tested | N/A |
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| | - Duration of test | N/A |
| | - Volume of waste used in test | N/A |
| | - Potential for hazardous waste migration to ground/surface waters (field test only) | N/A |
| 270.20(b) 264.271(a) | - Description of land treatment program | N/A |
| | - Waste to be land treated | N/A |
| | - Design measures to maximize treatment including | N/A |
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| | - Microbial/chemical reaction enhancements | N/A |
| | - Treatment zone moisture control measures | N/A |
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| | - List of and rationale for selecting compounds to be monitored | N/A |
| | - Monitoring equipment, procedures, frequency | N/A |
| | - Procedures for selecting sampling locations | N/A |
| | - Sample collection procedures | N/A |
| | - Sample preservation/shipment procedures | N/A |

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| | - Background value determination procedures | N/A |
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| 270.20(b)(4) | - List of hazardous constituents expected to be in, or derived from, wastes to be land treated | N/A |
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| 270.20(c)<br>264.273(b)-(f) | - Description of land treatment unit design | N/A |
| | - Procedures/equipment to prevent run-on from peak discharge of 25-year storm | N/A |
| | - Procedures/equipment to collect and control the run-off water volume from a 24-hour, 25-year storm | N/A |
| | - Procedures/equipment to minimize run-off from treatment zone during active life | N/A |
| | - Run-on and run-off collection and control systems management plan | N/A |
| | - Procedures/equipment for wind dispersal control | N/A |
| 270.20(d)<br>264.276(a) | - Documentation of request for growth of food-chain crops on treatment zone not receiving cadmium in wastes | N/A |
| 270.20(d)<br>264.276(a) | - Statement that demonstration of no risk to human health will be conducted by | N/A |
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| | - Greenhouse effect | N/A |
| | - Available data | N/A |

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| | - Operating data | N/A |
| | - Demonstration program description including | N/A |
| | - Soil pH | N/A |
| | - Cation exchange capacity of soil | N/A |
| | - Specific wastes to be applied | N/A |
| | - Waste application rates | N/A |
| | - Waste application methods | N/A |
| | - Identification of demonstration crops | N/A |
| | - Planting and growth procedures | N/A |
| | - Characteristics of crop | N/A |
| | - Sample selection criteria | N/A |
| | - Sample collection procedures | N/A |
| | - Sample size | N/A |
| | - Analyses methods | N/A |
| | - Statistical data evaluation procedures | N/A |
| | - Identification of comparison crops | N/A |
| | - Characteristics of crops | N/A |
| 270.20(d) 264.276(a) | - Planting and growth procedures | N/A |
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| | - Sample selection criteria | N/A |
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| 40 CFR Section | Subject Requirement | Page Number |
|---|---|---|
| | - Contact with waste/leachate | N/A |
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| | - Installation stresses | N/A |
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| 264.301(a)(2) | - Leachate collection and removal system to maintain less than one foot of leachate on liner including, | N/A |
| | - Materials of construction | N/A |
| | - Chemical resistance to waste/leachate | N/A |
| | - Strength sufficient to prevent collapse | N/A |
| 270.21(b)(1) | - Provisions to prevent clogging | N/A |
| 264.301(b) | - Liner system/leachate system exemption including | N/A |
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| | - Alternative design and operation | N/A |
| | - Landfill location description | N/A |
| | - Hydrogeologic setting | N/A |
| | - Attenuative capacity of materials between landfill and ground and surface waters | N/A |
| | - Documentation of no migrationto ground/surface waters at any future time | N/A |
| 270.21(b)(2)<br>264.301(c) | - System for control of run-on from peak discharge of a 25-year storm | N/A |
| 270.21(b)(3)<br>264.301(d) | - System for control of run-off water volume of a 24-hour, 25-year storm | N/A |
| 270.21(b)(4)<br>264.301(e) | - Procedures to manage collection and holding facilities associated with run-on and run-off control systems | N/A |
| 270.21(b)(5)<br>264.301(f) | - Wind dispersal; control procedures | N/A |

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| 270.21(c)<br>264.302(a) | - Documentation for Part 264, Subpart F exemption including | N/A |
| | - Landfill and liners above seasonal high water table | N/A |
| | - Two liners meeting requirements of §264.301(a)(1) | N/A |
| | - Leak detection system between liners | N/A |
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| 270.21(h); 264.314 | - Documentation of procedures/equipment for landfilling liquid wastes | N/A |
| 270.21(i); 264.315 | - Documentation of procedures/equipment for landfilling containers | N/A |
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| 270.14(c)(2) | - Identification of Uppermost and Hydraulically Interconnected Aquifers Under Facility Including, | N/A |
| | - Water flowrate and direction | N/A |
| | - Bases of identification | N/A |
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| 264.95(a) | - Deliniation of proposed point of compliance | N/A |
| | - Ground-water monitoring well locations | N/A |
| | - Location of aquifers | N/A |
| 270.14(c)(4) | - Description of Existing Contamination | N/A |
| | - Deliniation of plume extent | N/A |

| 40 CFR Section | Subject Requirement | Page Number |
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| | - Concentrations throughout plume | N/A |
| | - Maximum concentrations in plume | N/A |
| 270.14(c)(5)<br>264.97 | - Detailed Plans and an Engineering Reoprt of Ground Water Monitoring System | N/A |
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| | - Number of wells | N/A |
| | - Locations | N/A |
| | - Depths | N/A |
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| | - Assurance of compliance point ground water measurement | N/A |
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| 264.97(d) | - Description of sampling/analysis procedures | N/A |
| | - Sample collection methods | N/A |
| | - Sample preservation/shipment | N/A |
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| 264.97(e) | - Documentation of proper/adequate analytical procedures analytical procedures | N/A |
| 264.97(f) | - Procedure for determination of ground water elevation with each sample | N/A |
| 270.14(c)(6)<br>264.91(a)(4) and 264.98 | - Description of Detection Monitoring Program Including | N/A |
| 270.14(c)(6)(i)<br>264.93 and 264.98(a) | - List of indicator parameters, waste constituents, reaction products to be monitored for, including | N/A |

| 40 CFR Section | Subject Requirement | Page Number |
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| | - Detectability in ground-water | N/A |
| 270.14(c)(6)(iii)<br>264.98(a)(4) and<br>264.98(c)(1) | - Background ground-water concentration values and coefficients of variation established by | N/A |
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| 264.97(g)(1) | - Quaterly sampling of upgradient wells for one year, and | N/A |
| 264.97(g)(3) | - Quaterly sampling of other wells for one year, and | N/A |
| 264.97(g)(4) | - Data from a minimum of one sample/well and a minimum of four samples per quarter, or | N/A |
| | - Presentation of procedures to calculate such values | N/A |
| 270.14(c)(6)(ii)<br>264.98(b) | - Description of an appropriate ground-water monitoring system to be installed at a compliance point | N/A |
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| | - Active life | N/A |
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| | - Post-Closure period | N/A |
| 264.98(e) | - Procedure for annual determination of uppermost aquifer flow rate and direction | N/A |
| 264.98(f) &<br>264.97(d)&(e) | - Documentation of sample collection and analysis procedures | N/A |
| 264.98(g) | - Procedure for determining a statistically significant increase for any monitored parameter or constituted by | N/A |

| 40 CFR Section | Subject Requirement | Page Number |
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| | - Comparing compliance point data to background value data using the procedures in §264.97(h)(1) or (2), and | N/A |
| | - Providing an estimate of the time period after sampling completion necessary to obtain results | N/A |
| 270.14(c)(6)<br>264.98(h) | - Procedure to be implemented if a statistically significant increase in any constituent or parameter is identified at any compliance point monitoring well, including | N/A |
| 264.98(h)(1) | - Written notification to Regional Administrator | N/A |
| 264.98(h)(2) | - Sample collection and analysis methods for all Appendix VIII costituents at all monitoring wells | N/A |
| 264.98(h)(3) | - Method for establishing Appendix VIII constituent background values | N/A |
| 264.98(h)(4) | - Preparation of an application for permit modification to establish compliance monitoring | N/A |
| 270.14(c)(7)<br>264.91(1) & 264.99 | - Description of Compliance Monitoring Program, including | N/A |
| | - List of wastes previously handled at facility | N/A |
| | - Characterization of contaminated groundwater | N/A |
| | - Hazardous constituents identified | N/A |
| | - Hazardous constituents concentrations | N/A |
| 264.99(b) | - Description of compliance monitoring system at the compliance point | N/A |
| | - List of hazardous constituents to be compliance monitored | N/A |
| 264.96 | - Proposed compliance period | N/A |
| 264.99(d) | - Procedure for collecting quaterly samples at compliance point during compliance period | N/A |
| 264.99(c)(3) | - Procedures for establishing background constituents values for constituents that are based upon | N/A |

| 40 CFR Section | Subject Requirement | Page Number |
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| | - Use of an appropriate ground-water monitoring system, and | N/A |
| 264.97(g) | - Data that is available prior to permit issuance | N/A |
| | - Data that accounts for measurement errors in sampling and analysis | N/A |
| | - Data that accounts for seasonal ground-water quality fluctuations | N/A |
| | - Data from a minimum of one sample per well and a minimum of four samples monitoring system, each time sample is sampled | N/A |
| 270.14(c)(7)(iv)<br>264.92 and<br>164.99(c)(1)&(2) | - Proposed concentration limits for constiuents with justification based on | N/A |
| | - §264.94(a)(1) and 264. 97(g) | N/A |
| | - §264.94(a)(2) | N/A |
| | - §264.94(b) and 264.99(c)(1) | N/A |
| 264.99(e) | - Procedure for annual determination of uppermost aquifer flow rate and direction | N/A |
| 264.99(f) | - Procedures for annual testing of all compliance point wells for Appendix VIII constituents | N/A |
| 264.99(g) | - Documentation of all sampling and analysis procedures | N/A |
| 264.99(h) | - Procedures for determing a statistically significant increase for any monitored constituent by | N/A |
| | - Comparing compliance point data to the concentration limit using the procedure in §264.97(h)(2) | N/A |
| | - Providing an estimate of the time period after sampling completion necessary to obtain results | N/A |
| 264.99(i) | - Procedures to be implemented if the ground-water protection standard is exceeded at any compliance point monitoring well, including | N/A |

| 40 CFR Section | Subject Requirement | Page Number |
|---|---|---|
| 264.99(i)(1) | - Written notification to Regional Administrator | N/A |
| 264.99(i)(2) | - Preparation of an application for permit modification to establish a corrective action program, including | N/A |
| | - Details of program to comply with ground-water protection standard | N/A |
| 270.14(c)(7)(v)<br>264.99(i)(2)(ii) | - Details of ground-water monitoring to determine effectiveness of program | N/A |
| 270.14(c)(8)<br>264.91(a)(2) and 264.100 | - Determination of Corrective Action Program including | N/A |
| 170.14(c)(8)(i) | - Characterization of contaminated ground-water | N/A |
| 164.100(a)(1) | - Identified hazardous constituents | N/A |
| | - Concentrations of hazardous constituents | N/A |
| 270.14(c)(8)(ii)<br>264.100(a)(2) | - Concentration limit for each hazardous constituent | N/A |
| 270.14(c)(8)(iii)<br>264.100(b) | - Detailed plan and an engineering report describing the corrective actions to be taken at the compliance point | N/A |
| 264.100(c) | - Time period necessary to implement corrective action program | N/A |
| 270.14(c)(8)(iv)<br>264.100(d) | - Description of ground-water monitoring program that will be sufficient to assess the adequacy of corrective measures | N/A |
| 264.91(a)(3) and<br>264.100(e) | - Description of the corrective action to be taken for constituents in fround-water between compliance point and downgradient facility boundary | N/A |
| 264.100(g) | - Procedure and content for semi-annually submitting written reports to be Regional Administrator on program effectiveness | N/A |
| | **Part B Certification and Signatories** | |
| 270.11(d) | - Certification Paragraph | I |
| 270.11(a) | - Appropriate Signatory | I |

# Part A

Please print or type in the unshaded areas only
*(fill–in areas are spaced for elite type, i.e., 12 characters/inch).*

*Form Approved OMB No. 158-R0175*

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

# GENERAL INFORMATION

*Consolidated Permits Program*

*(Read the "General Instructions" before starting.)*

**I. EPA I.D. NUMBER**

| | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | | | | | | | | | | | | | | | | | | | | | | | | |
| F | N | M | D | 0 | 8 | 5 | 2 | 6 | 7 | 9 | 6 | 1 | | | | | | | | | | | | | |
| 1 | 2 | | | | | | | | | | | 13 | | | | | | | | | | | | 14 | 15 |

**GENERAL INSTRUCTIONS**

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill–in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill–in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

**LABEL ITEMS**

- EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

## II. POLLUTANT CHARACTERISTICS

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold–faced terms.

| SPECIFIC QUESTIONS | MARK 'X' YES | NO | FORM ATTACHED | SPECIFIC QUESTIONS | MARK 'X' YES | NO | FORM ATTACHED |
|---|---|---|---|---|---|---|---|
| A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A) | | X | | B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B) | | X | |
| C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C) | | X | | D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D) | | X | |
| E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3) | X | | X | F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4) | | X | |
| G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4) | | X | | H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4) | | X | |
| I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) | | X | | J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5) | | X | |

## III. NAME OF FACILITY

1 SKIP: RINCHEM COMPANY INC.

## IV. FACILITY CONTACT

| A. NAME & TITLE *(last, first, & title)* | B. PHONE *(area code & no.)* |
|---|---|
| 2 KIMBALL TIM HWM COORDINATOR | 505 345 3655 |

## V. FACILITY MAILING ADDRESS

| A. STREET OR P.O. BOX | | | |
|---|---|---|---|
| 3 6133 EDITH BOULEVARD NE | | | |
| **B. CITY OR TOWN** | **C. STATE** | **D. ZIP CODE** | |
| 4 ALBUQUERQUE | NM | 87107 | |

## VI. FACILITY LOCATION

| A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER | | | |
|---|---|---|---|
| 5 SAME | | | |
| **B. COUNTY NAME** | | | |
| BERNALILLO | | | |
| **C. CITY OR TOWN** | **D. STATE** | **E. ZIP CODE** | **F. COUNTY CODE** *(if known)* |
| 6 ALBUQUERQUE | NM | 87107 | |

CONTINUED FROM THE FRONT

## VII. SIC CODES (4-digit, in order of priority)

| A. FIRST | B. SECOND |
|---|---|
| 5161 (specify) CHEMICAL AND ALLIED PRODUCTS | (specify) |
| **C. THIRD** | **D. FOURTH** |
| (specify) | (specify) |

## VIII. OPERATOR INFORMATION

**A. NAME**

RINCHEM COMPANY INC.

**B. Is the name listed in Item VIII-A also the owner?** ☐ YES ☒ NO

**C. STATUS OF OPERATOR** (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)

P (specify)

**D. PHONE** (area code & no.) A 505 345 3655

**E. STREET OR P.O. BOX**

6133 EDITH BOULEVARD NE

**F. CITY OR TOWN**

ALBUQUERQUE

**G. STATE** NM

**H. ZIP CODE** 87107

## IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

## X. EXISTING ENVIRONMENTAL PERMITS

| A. NPDES (Discharges to Surface Water) | D. PSD (Air Emissions from Proposed Sources) |
|---|---|
| 9 N | 9 P |
| **B. UIC (Underground Injection of Fluids)** | **E. OTHER (specify)** |
| 9 U | 9 (specify) |
| **C. RCRA (Hazardous Wastes)** | **E. OTHER (specify)** |
| 02208627 NMD085267961 | 9 (specify) |

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

The prime purpose of this facility is to serve as a Chemical Distribution Center. Approximately 80% of Rinchem's sales are prepackaged solvents, resins, fiberglass, and miscellaneous industrial chemicals.

Rinchem warehouses other companies' products for hire at the facility. It is anticipated that more than half of the building's square footage will be used for public warehousing.

Rinchem receives drums of industrial waste from different generators and stores this waste for eventual transfer to recycling facilities, disposal sites, or other waste transfer stations.

## XIII. CERTIFICATION (see instructions)

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

| A. NAME & OFFICIAL TITLE (type or print) | B. SIGNATURE | C. DATE SIGNED |
|---|---|---|
| William Moore, President | | August 5, 1986 |

**COMMENTS FOR OFFICIAL USE ONLY**

C

EPA Form 3510-1 (6-80) REVERSE

Please print or type in the unshaded areas only
*(fill—in areas are spaced for elite type, i.e., 12 characters/inch).*

*Form Approved OMB No. 158-S80004*

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

# HAZARDOUS WASTE PERMIT APPLICATION

*Consolidated Permits Program*

*(This information is required under Section 3005 of RCRA.)*

**I. EPA I.D. NUMBER**

| | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| F | N | M | D | 0 | 8 | 5 | 2 | 6 | 7 | 9 | 6 | 1 | 1 |

**FOR OFFICIAL USE ONLY**

| APPLICATION APPROVED | DATE RECEIVED (yr., mo., & day) | COMMENTS |
|---|---|---|
| | | |

## II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

**A. FIRST APPLICATION** *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

| | YR. | MO. | DAY |
|---|---|---|---|
| 8 | | | |

☒ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

| YR. | MO. | DAY |
|---|---|---|
| 8 7 | 0 1 | 0 1 |

**B. REVISED APPLICATION** *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

## III. PROCESSES – CODES AND DESIGN CAPACITIES

**A. PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

**B. PROCESS DESIGN CAPACITY** – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

| PROCESS | PROCESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY |
|---|---|---|
| **Storage:** | | |
| CONTAINER *(barrel, drum, etc.)* | S01 | GALLONS OR LITERS |
| TANK | S02 | GALLONS OR LITERS |
| WASTE PILE | S03 | CUBIC YARDS OR CUBIC METERS |
| SURFACE IMPOUNDMENT | S04 | GALLONS OR LITERS |
| **Disposal:** | | |
| INJECTION WELL | D79 | GALLONS OR LITERS |
| LANDFILL | D80 | ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER |
| LAND APPLICATION | D81 | ACRES OR HECTARES |
| OCEAN DISPOSAL | D82 | GALLONS PER DAY OR LITERS PER DAY |
| SURFACE IMPOUNDMENT | D83 | GALLONS OR LITERS |

| PROCESS | PROCESS CODE | APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY |
|---|---|---|
| **Treatment:** | | |
| TANK | T01 | GALLONS PER DAY OR LITERS PER DAY |
| SURFACE IMPOUNDMENT | T02 | GALLONS PER DAY OR LITERS PER DAY |
| INCINERATOR | T03 | TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR |
| OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)* | T04 | GALLONS PER DAY OR LITERS PER DAY |

| UNIT OF MEASURE | UNIT OF MEASURE CODE |
|---|---|
| GALLONS | G |
| LITERS | L |
| CUBIC YARDS | Y |
| CUBIC METERS | C |
| GALLONS PER DAY | U |
| LITERS PER DAY | V |
| TONS PER HOUR | D |
| METRIC TONS PER HOUR | W |
| GALLONS PER HOUR | E |
| LITERS PER HOUR | H |
| ACRE-FEET | A |
| HECTARE-METER | F |
| ACRES | B |
| HECTARES | Q |

**EXAMPLE FOR COMPLETING ITEM III** *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 1

| LINE NUMBER | A. PROCESS CODE (from list above) | B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify) | B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code) | FOR OFFICIAL USE ONLY | LINE NUMBER | A. PROCESS CODE (from list above) | B. PROCESS DESIGN CAPACITY 1. AMOUNT | B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code) | FOR OFFICIAL USE ONLY |
|---|---|---|---|---|---|---|---|---|---|
| X-1 | S 0 2 | 600 | G | | 5 | | | | |
| X-2 | T 0 3 | 20 | E | | 6 | | | | |
| 1 | S 0 1 | 27,500 | G | | 7 | | | | |
| | | | | | 8 | | | | |
| 3 | | | | | 9 | | | | |
| 4 | | | | | 10 | | | | |

Continued from the front.

## III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

No additional codes

## IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | CODE | METRIC UNIT OF MEASURE | CODE |
|---|---|---|---|
| POUNDS | P | KILOGRAMS | K |
| TONS | T | METRIC TONS | M |

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   **For listed hazardous waste:** For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   **For non–listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   **Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV** *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES 1. PROCESS CODES (enter) | D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1)) |
|---|---|---|---|---|---|
| X-1 | K 0 5 4 | 900 | P | T 0 3 D 8 0 | |
| X-2 | D 0 0 2 | 400 | P | T 0 3 D 8 0 | |
| X-3 | D 0 0 1 | 100 | P | T 0 3 D 8 0 | |
| X-4 | D 0 0 2 | | | | included with above |

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): WNMDO852679641 T/A C 1

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## IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

| | A. EPA HAZARD. WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES 1. PROCESS CODES (enter) | D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1)) |
|---|---|---|---|---|---|
| 1 | D001 | 150,000 | P | S01 | |
| 2 | F001 | 400,000 | P | S01 | |
| 3 | F002 | 200,000 | P | S01 | |
| 4 | F003 | 200,000 | P | S01 | |
| 5 | F004 | 1,000 | P | S01 | |
| 6 | F005 | 200,000 | P | S01 | |
| 7 | P005 | 1,000 | P | S01 | |
| 8 | P022 | 1,000 | P | S01 | |
| 9 | U001 | 1,000 | P | S01 | |
| 10 | U002 | 1,000 | P | S01 | |
| 11 | U003 | 1,000 | P | S01 | |
| 12 | U008 | 1,000 | P | S01 | |
| | U012 | 1,000 | P | S01 | |
| 14 | U019 | 1,000 | P | S01 | |
| 15 | U031 | 1,000 | P | S01 | |
| 16 | U211 | 1,000 | P | S01 | |
| 17 | U037 | 1,000 | P | S01 | |
| 18 | U044 | 1,000 | P | S01 | |
| 19 | U052 | 1,000 | P | S01 | |
| 20 | U057 | 1,000 | P | S01 | |
| 21 | U069 | 1,000 | P | S01 | |
| 22 | U070 | 1,000 | P | S01 | |
| 23 | U071 | 1,000 | P | S01 | |
| 24 | U072 | 1,000 | P | S01 | |
| 25 | U025 | 1,000 | P | S01 | |
| | U051 | 1,000 | P | S01 | |

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CONTINUE ON REVERSE

Continued from page 2.

*NOTE: Photocopy this page before completing if you have more than 26 wastes to list.*

*Form Approved OMB No. 158-S80004*

| EPA I.D. NUMBER (enter from page 1) | | | | | | | | | | | | | T/A | C | FOR OFFICIAL USE ONLY | | | | | | | | | | | | | | | | T/A | C | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| W | N | M | D | 0 | 8 | 5 | 2 | 6 | 7 | 9 | 6 | 4 | | 1 | W | D | U | P | | | | | | | | | | | | | | 2 | D U P |

## IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES 1. PROCESS CODES (enter) | D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1)) |
|---|---|---|---|---|---|
| 1 | U088 | 1,000 | P | S01 | |
| 2 | U092 | 1,000 | P | S01 | |
| 3 | U102 | 1,000 | P | S01 | |
| 4 | U107 | 1,000 | P | S01 | |
| 5 | U112 | 1,000 | P | S01 | |
| 6 | U113 | 1,000 | P | S01 | |
| 7 | U117 | 1,000 | P | S01 | |
| 8 | U118 | 1,000 | P | S01 | |
| 9 | U124 | 1,000 | P | S01 | |
| 10 | U125 | 1,000 | P | S01 | |
| 11 | U127 | 1,000 | P | S01 | |
| 12 | U140 | 1,000 | P | S01 | |
| 13 | U154 | 1,000 | P | S01 | |
| 14 | U080 | 1,000 | P | S01 | |
| 15 | U159 | 1,000 | P | S01 | |
| 16 | U161 | 1,000 | P | S01 | |
| 17 | U162 | 1,000 | P | S01 | |
| 18 | U165 | 1,000 | P | S01 | |
| 19 | U169 | 1,000 | P | S01 | |
| 20 | U171 | 1,000 | P | S01 | |
| 21 | U188 | 1,000 | P | S01 | |
| 22 | U191 | 1,000 | P | S01 | |
| 23 | U196 | 1,000 | P | S01 | |
| 24 | U210 | 1,000 | P | S01 | |
| 25 | U213 | 1,000 | P | S01 | |
| 26 | U220 | 1,000 | P | S01 | |

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CONTINUE ON REVERSE



*(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)*

Continued from page 2.

*NOTE: Photocopy this page before completing if you have more than 26 wastes to list.*

*Form Approved OMB No. 158-S80004*

| EPA I.D. NUMBER (enter from page 1) | | | | | | | | | | | | | T/A | C | FOR OFFICIAL USE ONLY | | | | T/A | C | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| W | N | M | D | 0 | 8 | 5 | 2 | 6 | 7 | 9 | 6 | 1 | | 1 | W | DUP | | | | 2 | DUP |

## DESCRIPTION OF HAZARDOUS WASTES (continued)

| LINE NO. | A. EPA HAZARD. WASTE NO. (enter code) | B. ESTIMATED ANNUAL QUANTITY OF WASTE | C. UNIT OF MEASURE (enter code) | D. PROCESSES 1. PROCESS CODES (enter) | D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) |
|---|---|---|---|---|---|
| 1 | U226 | 1,000 | P | S01 | |
| 2 | U227 | 1,000 | P | S01 | |
| 3 | U228 | 1,000 | P | S01 | |
| 4 | U121 | 1,000 | P | S01 | |
| 5 | U239 | 1,000 | P | S01 | |
| 6 | | | | | |
| 7 | | | | | |
| 8 | | | | | |
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| 24 | | | | | |
| 25 | | | | | |
| 26 | | | | | |



CONTINUE ON REVERSE

Continued from the front.

## IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

We have included in the listing of the estimated annual quantity of waste a number of wastes such as U001, U002, etc., which we estimated could be 1,000 pounds each. These quantities are arbitrary. We may receive none or a larger quantity. It is very unpredictable.

**EPA I.D. NO. *(enter from page 1)***

| | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| F | N | M | D | 0 | 8 | 5 | 2 | 6 | 7 | 9 | 6 | 4 | | 6 |

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

## VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

## VII. FACILITY GEOGRAPHIC LOCATION

| LATITUDE *(degrees, minutes, & seconds)* | LONGITUDE *(degrees, minutes, & seconds)* |
|---|---|
| 35 08 39" | 106 37' 43" |

## VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

☑ B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

| 1. NAME OF FACILITY'S LEGAL OWNER | 2. PHONE NO. *(area code & no.)* |
|---|---|
| E R.C.I. Services Company | 505-345-3655 |

| 3. STREET OR P.O. BOX | 4. CITY OR TOWN | 5. ST. | 6. ZIP CODE |
|---|---|---|---|
| F 6133 Edith Boulevard NE | G Albuquerque | NM | 87107 |

## IX. OWNER CERTIFICATION

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

| A. NAME *(print or type)* | B. SIGNATURE | C. DATE SIGNED |
|---|---|---|
| William Moore | | August 5, 1986 |

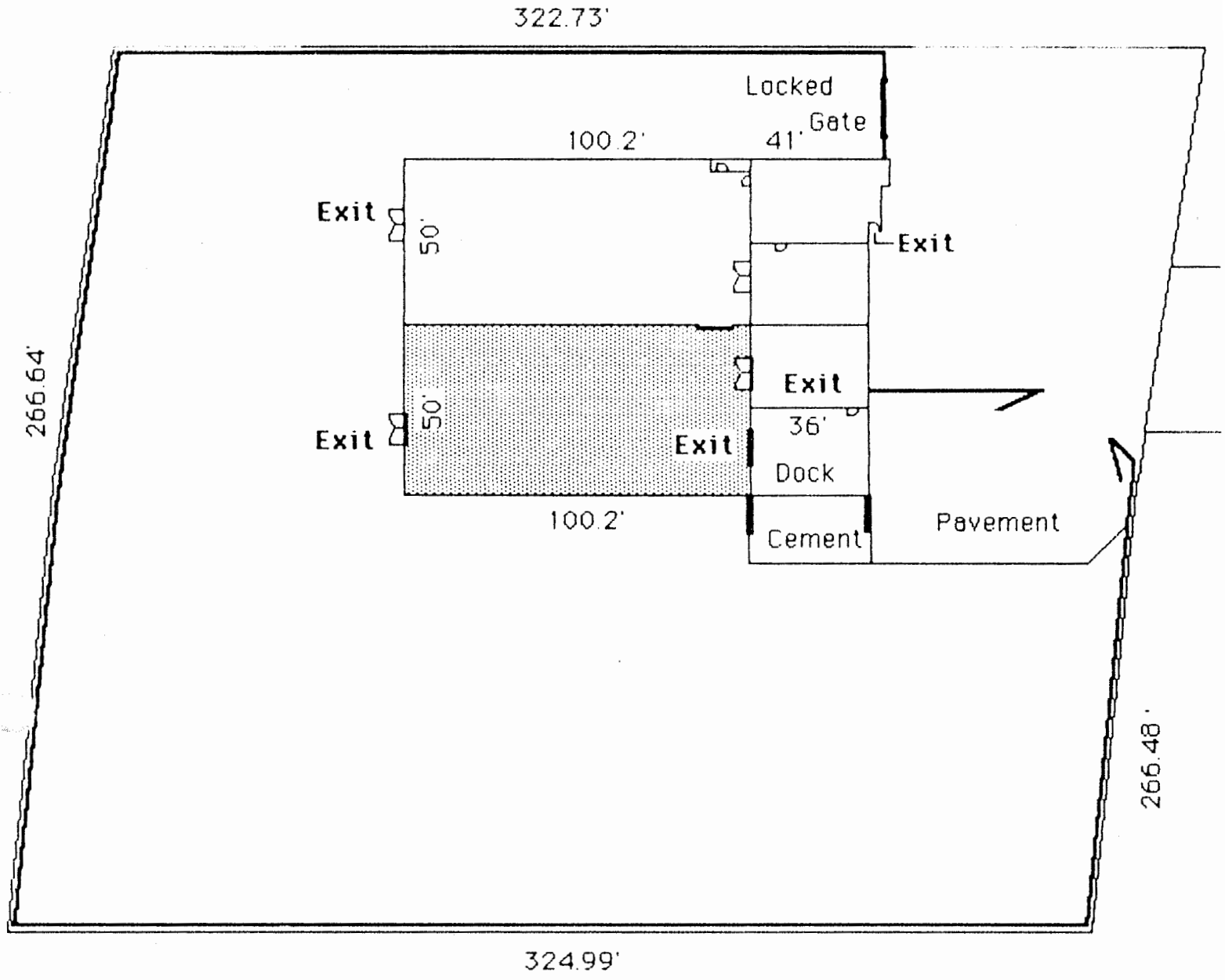
## X. OPERATOR CERTIFICATION

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

| A. NAME *(print or type)* | B. SIGNATURE | C. DATE SIGNED |
|---|---|---|
| William Moore, President | | August 5, 1986 |

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*



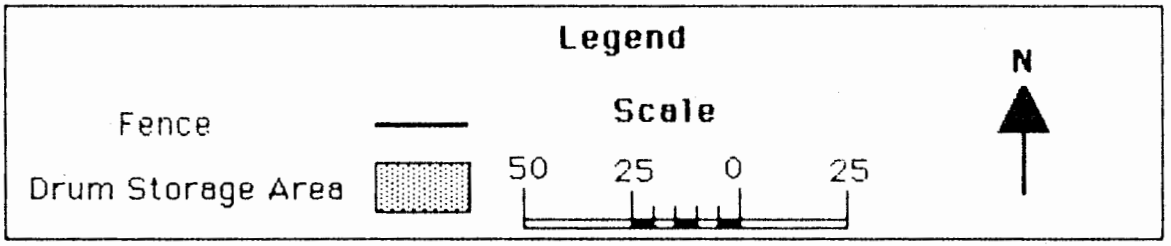
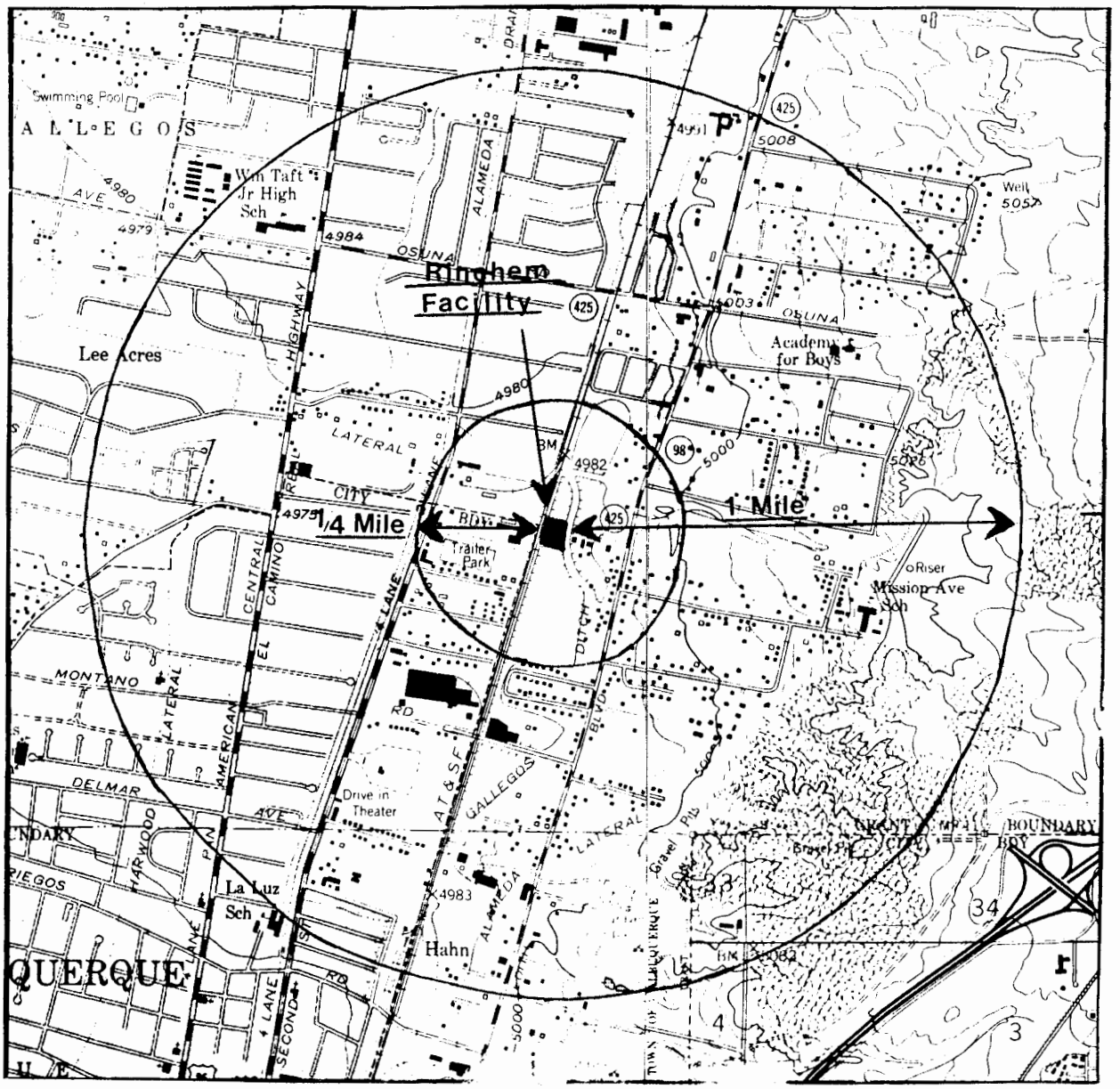




Figure A-1. Facility Drawing




Longitude - 106° 37' 43"

Latitude - 35° 08' 39"

**Source:** U.S. Geological Survey
Los Griegos and Alameda Quadrangles
7.5 minute series
photorevised 1972

N

Scale

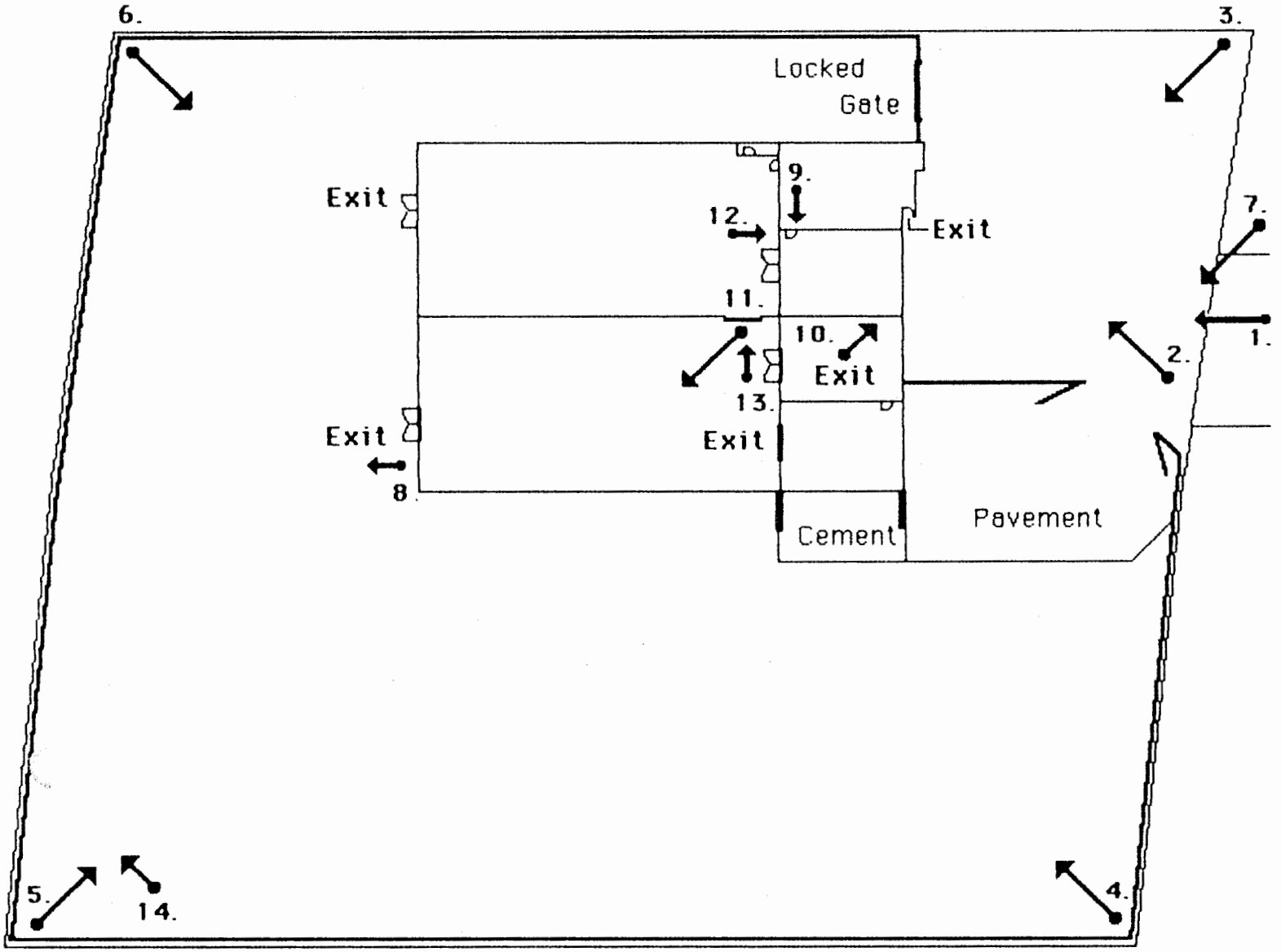
**Note:** No injection wells or withdrawal wells are shown because no wells are known to be used within 1/4 mile of the facility. Several wells have been abondoned because of the lowering of the water table. The information was obtained from well records in the State Engineer's Office. This was also confirmed by a survey of the residential areas surrounding the facility site.

Figure A-2. Topographic Map (1 Mile Radius)

A. Photographic Essay [N.M. - 302.A.4.a.(13), Federal - 270.13(h)(2)]

The photographs presented in this section are intended to acquaint the reviewer with existing structures at the Rinchem Company facility. The approximate origin points of the photographs and the corresponding directions of the fields of view are shown in Figure A-3.

Photographs 1-6, 10, and 13 were taken in April 1984. The remainder of the photographs were taken in July 1986.




**Legend**

**Photographs**

1. Road Easement
2. Office Entrance
3. View from Northeast Corner
4. View from Southeast Corner
5. View from Southwest Corner
6. View from Northwest Corner
7. Access Gate to Dock
8. Tanks
9. No Smoking Signs
10. Southern Temp. Control Room
11. Storage Area
12. Fire Extinguishers
13. Drains
14. Groundwater Well

Fence

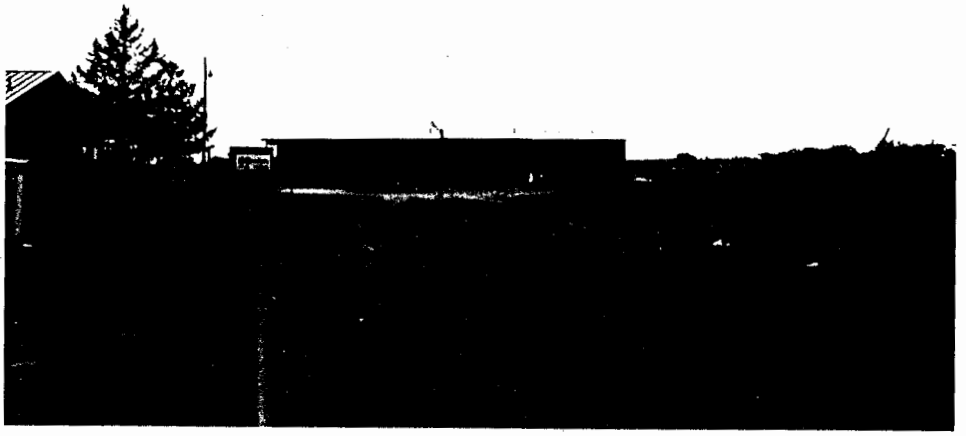
Direction of View
Point Where Photo
Was Taken

N

**Scale**

50 25 0 25

Figure A-3. Photograph Index

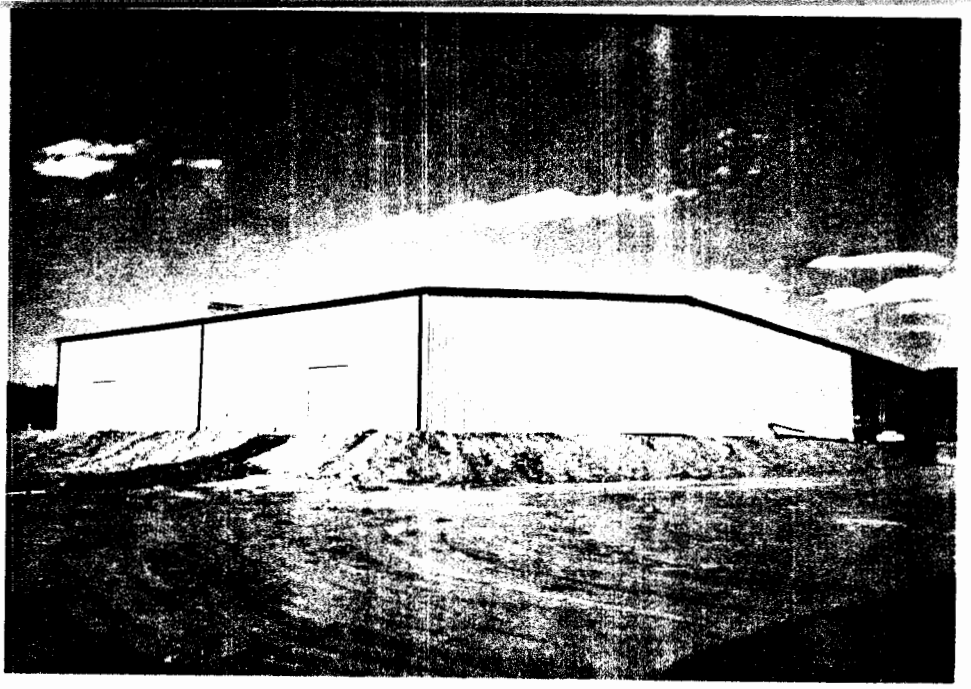


Photograph 1. The road easement leading to the Rinchem facility. Note the elevated area where the building was built.

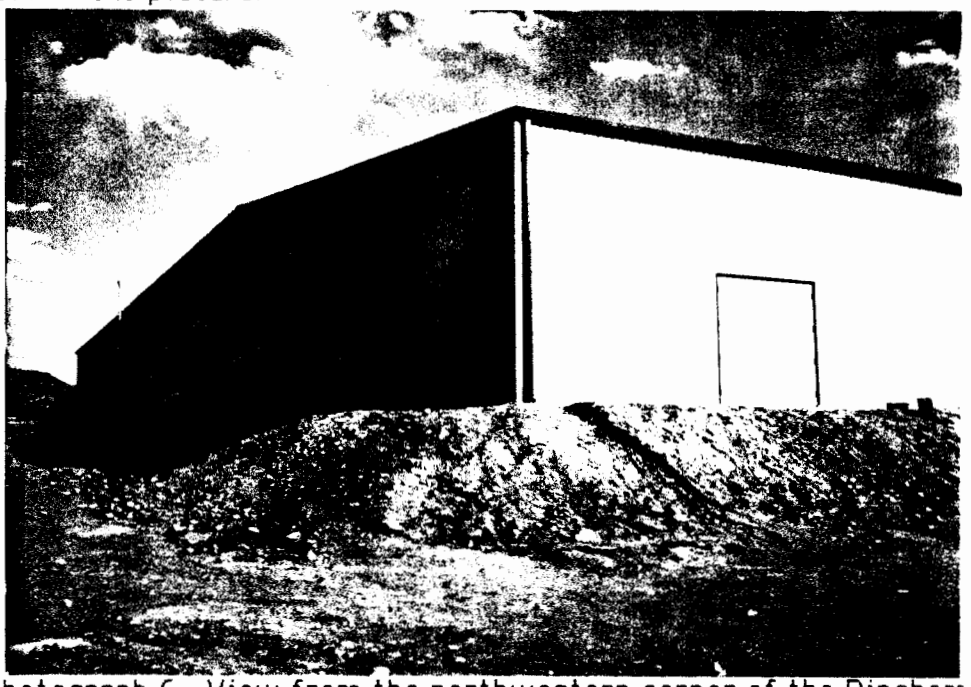
Photograph 2. The office entrance into the facility. All visitors that visit the Rinchem facility check in with the office.

Photograph 3. View from northeast corner of property. Note the closed northern facility gate on right along with warning sign. The office entrance is also shown in the photograph.

Photograph 4. View from southeast corner of Rinchem property. The dock can be seen on the right. Note the elevated ground surrounding the building.

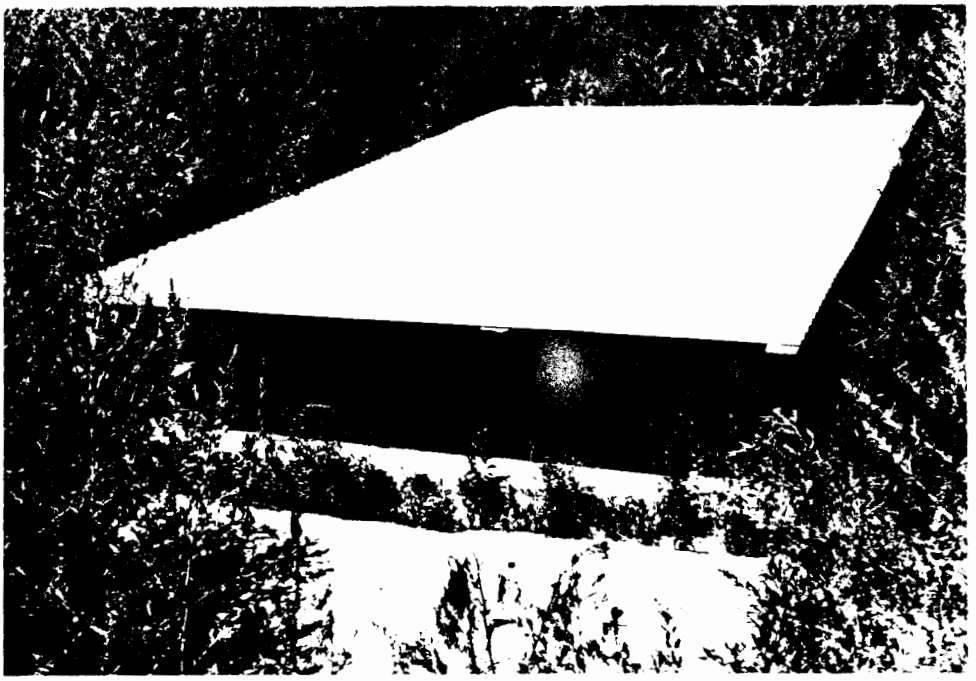


Photograph 5. View from southwestern corner of the Rinchem property. The back exits can be seen. A section of the four-hour fire wall dividing the warehouse in two can also be seen. The concrete tank used in secondary containment can also be seen in the extreme left of the picture.

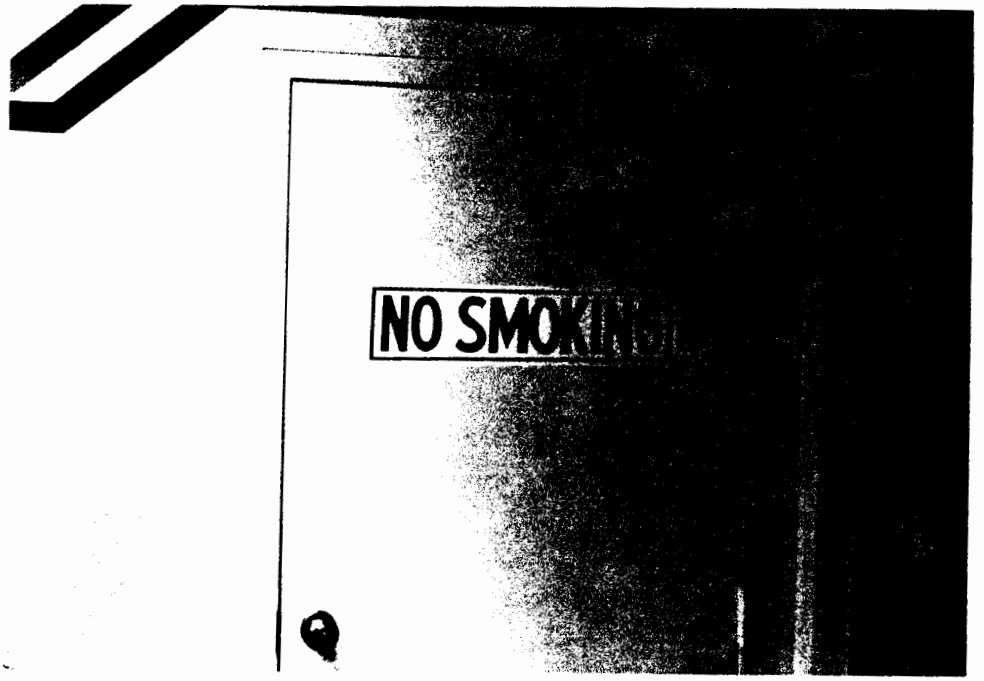


Photograph 6. View from the northwestern corner of the Rinchem property. Note the erosion due to runoff from the gutter. Presently, there is a gutter system which removes the water to the edge of the property, erasing the erosion problem. This gutter system is not shown in this picture.

Photograph 7. The access gate to the dock area. Note the stop sign, no smoking sign on the left, and the "check in with the office" signs by the stop sign and on the right of the picture.



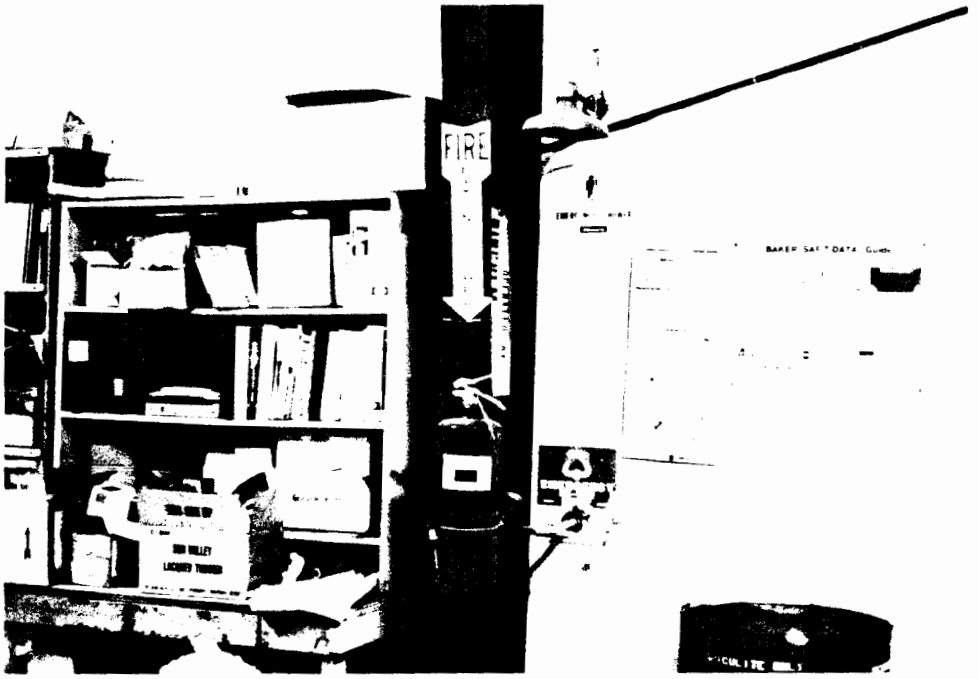
Photograph 8. View of the cover over the tanks that are used to contain any spills that may occur in the hazardous waste storage area. A 500 gallon tank is enclosed in another watertight cement tank.



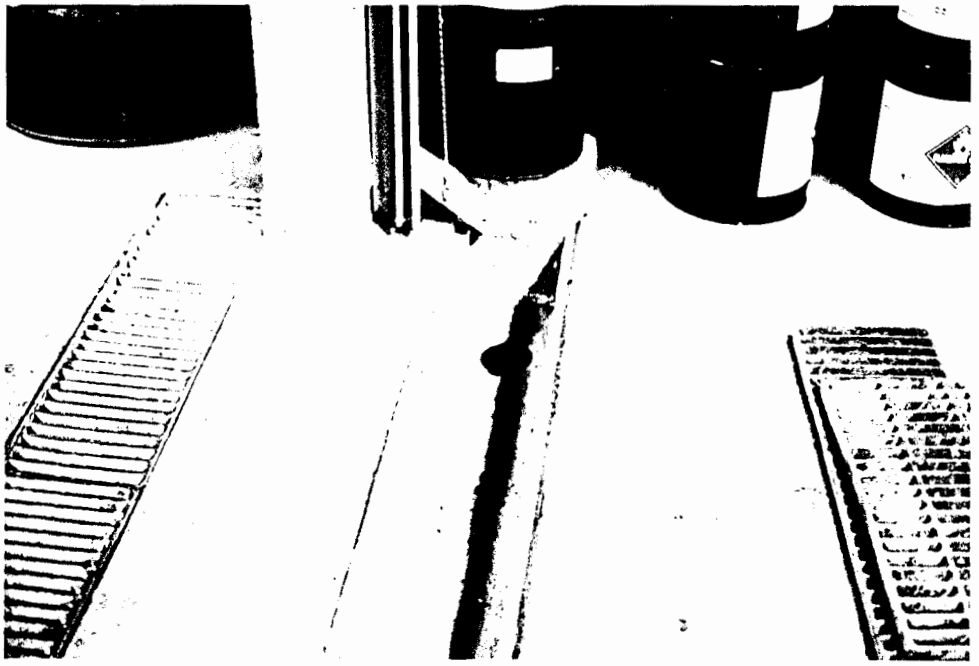

Photograph 9. View of entrance into warehouse from office. All entrances into the warehouse have no smoking signs. Smoking is only allowed in the office area.


Photograph 10. View of northeast corner of southern temperature control room. Combustibles are kept in this room.

Photograph 11. A view of the storage area for hazardous waste. This is the southern half of the warehouse and the hazardous waste is separated from incompatible materials by a four-hour fire wall.




Photograph 12. Close-up of fire extiguisher and eyewash/shower that is found in the northern half of the warehouse. All fire extiguishers and eyewash/showers are identical in the facility.



Photograph 13. A close up of the drain between the two halves of the warehouse. The drains would catch any waste spills and store them in the tanks already shown ( photograph 8 ).

Photograph 14. Close-up of groundwater well found in southwestern corner of property. This ground water well is used to test for changes in the groundwater in the vicinity of the Rinchem facility.

# I

# Facility Description

## I. Facility Description

A. General Facility Description [N.M.-302.A.4.b(1)(a), Federal-270.14(b)(1)]

A.1 General Description

The RINCHEM COMPANY, INC Albuquerque Chemical Distribution Center is located at 6133 Edith Blvd N.E., Bernalillo County, New Mexico. The two-acre site is zoned M-1. The facility is 600 feet west of Edith Blvd. and just east of the Santa Fe Railroad mainline. It is located about a half-mile south and slightly west of the Bernalillo County fire station #9.

The legal description of the property is as follows:

> Lot 4A-1 Subdivision of Lot 4A Edith Land Company, as the same is shown and designated on the Replat of Lot 4A, Edith Land Company, now comprising Lots 4A-1, 4A-2, filed in the Office of the County Clerk, New Mexico, on May 20, 1983.

This is recorded in book C21 on page 80 filed in the office of the Bernalillo County Clerk.

The waste stored at Rinchem is generated offsite. The existing facility will be used to temporarily store drums from Rinchem and other transporters for eventual transfer to recycling centers,

disposal sites, or other waste transfer stations, as necessary.

## A.2 Identification of Facility

EPA ID# NMD085267961

Name: Rinchem Company, Inc.

Address: 6133 Edith Blvd N.E.

Albuquerque, New Mexico 87107

Telephone: # 505-345-3655

## A.3 Owner of Property

Name: RCI Services Company

Address: 6133 Edith Blvd N.E.

Albuquerque, New Mexico 87107

Telephone: # 505-345-3655

The property is leased and operated by Rinchem Company, Inc.

## A.4 Activities Conducted

### A.4.1 Chemical Distribution Activity

The prime purpose of the property is to serve as Rinchem Company's Chemical Distribution Center. Approximately 80 percent of Rinchem's sales are prepackaged solvents, resins, fiberglass and miscellaneous industrial chemicals. They are removed from van trailers, warehoused, and delivered in their original containers. The

balance are received in bulk tank wagons. This portion is either drummed immediately or stored in bulk tanks for future drumming. A very small portion of Rinchem's output is blended and/or packaged in five gallon pails.

### A.4.2 Public Warehousing Activities

Rinchem warehouses other companies' products for hire at its Albuquerque Chemical Distribution Center. It is anticipated that more than half of the building's square footage will be used for public warehousing. Public warehoused inventory is under Rinchem's care and custody, but warehousing clients are involved in training and safety. They release the product for shipment as needed.

### A.4.3 Waste Management Activity

At this time, Rinchem Company, Inc., is a transporter of hazardous waste and warehouses waste at its facility for a maximum period of 10 days. The transfer station receives drums of industrial waste from Rinchem and other transporters. The drums are consolidated for truckload shipment to recycling facilities, disposal sites, or other waste transfer stations, as necessary. The majority of waste handled by Rinchem Company, Inc. is organic solvents to be recylced or incinerated. Other wastes which are handled at this time include solid waste (such as debris and filter cake), and aqueous solutions containing heavy metals, alkaline materials and oil. Historically, about 75 percent of the drums handled by Rinchem have

been for recycling and incineration and about 25 percent for land disposal.

The number of drums generally on the transfer site at any one time is most often in the 10 to 30 drum range. However, on occasion, there have been as many as 100 drums at the facility. The potential exists to accumulate 200 drums in a ten day period.

Under this permit, Rinchem Company, Inc. anticipates storing for a period exceeding10 days only two types of wastes. The first type would be organic solvents to be recycled. The second type of would be organic solvents and oils to be incinerated. The EPA hazardous waste numbers are given in part A of this permit application as well as in the Waste Analysis section. Rinchem does not accept radioactive materials, or explosives. Materials are not accepted until the final destination and handling of the wastes have been determined.

B. Facility Location [New Mex-302.A.4.b.(1)(k), Federal-270.14(b)(11)]

B.1. Political Jurisdiction [N.M.-302.A.4.b.(1)(k)(i),U.S.-270.14(b)(11)(i)]

The political jurisdiction of the Rinchem Company Inc. is the county of Bernalillo in the state of New Mexico. This county is included in Appendix IV of Part 264 in the federal regulations and is listed in 206.B.8 of the New Mexico State regulations. Because it is listed, Rinchem must demonstrate compliance with the seismic standard found in the regulations.

B.2. Seismic Compliance [N.M.-302.A.4.b.(1)(k)(ii),U.S.-270.14(b)(11)(ii)]

No faults having had displacement in Holecene time are present at this site which is located at Albuquerque, Bernalillo County, New Mexico. The University of New Mexico library contains a published geologic map of Albuquerque and Bernalillo County entitled, "Geology of Albuquerque Basin." This geologic map was prepared by Vincent C. Kelley in 1977. It shows the different bedrock found in the geology of the Albuquerque basin. This map also shows the faults that are present in this area. Figure 1 (next page) is a photocopy of this map. The facility is identified on the map. As can be seen, there is not a fault within 3-4 miles of the facility. This coincides with the type of geology found under the facility. The facility is located over alluvium as can be seen on the map. This type of geology is more common in a valley rather than an area where faults would be prevelant.

B.3 Floodplain Standard

[N.M.-302.A.4.b.(1)(k)(iii), Federal-270.14(b)(11)(iii), 264.18(b)]

Using a Flood Insurance Rate Map of the city of Albuquerque, New Mexico, Bernalillo County, the facillity is not located in an area subject to a 100-year flood. A copy of the map used for this determination is shown in Figure 2 and Figure 3 (pages 7-8). The facility is identified on the map in Figure 3. The lot which encompasses the facility touches the boundary for the 100-year floodplain but is not part of it.

Figure 1 - The Geology of the Albuquerque Basin

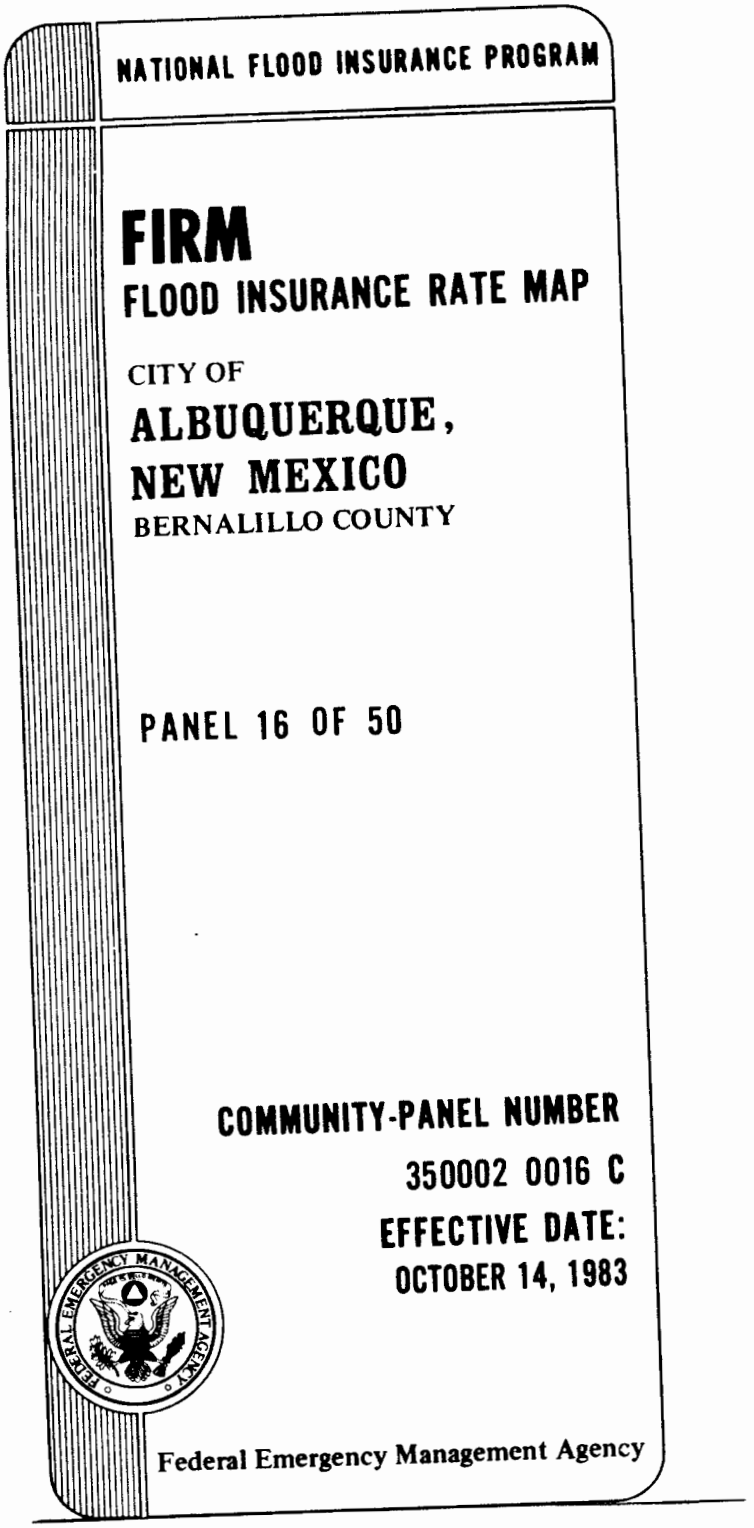



Figure 2 - The Flood Rate Insurance Map


Figure 3 - Location of 100-Year Floodplain

The map also shows the type of flood waters that would be encountered in the nearest floodplain. This floodplain is an area of 100-year shallow flooding where depths are from one to three feet.

Prior to construction, the land on which the building is located was elevated five feet above the surrounding land. The reason was to alleviate any problems that would be caused by a flood. Even if a 100-year flood occurred, the builidng would be high enough above the nearby floodplain to prevent damage or water contamination. In this way, the hazard caused by bordering a 100-year floodplain was eliminated.

C. Topographic Map [N.M. - 302.A.4.b(1)(r), U.S. - 270.14(b)(19)]

C.1 General Discussion

The mapping requirements of the state and federal regulations are met in this application through the following combination of figures.

Figure 4 (page 10) Topography within 1000 feet of the facility (scale: 1 inch = 200 feet); patterns of surface flow, including drainage ditches; surrounding land uses; legal boundaries of the facility property; floodplain

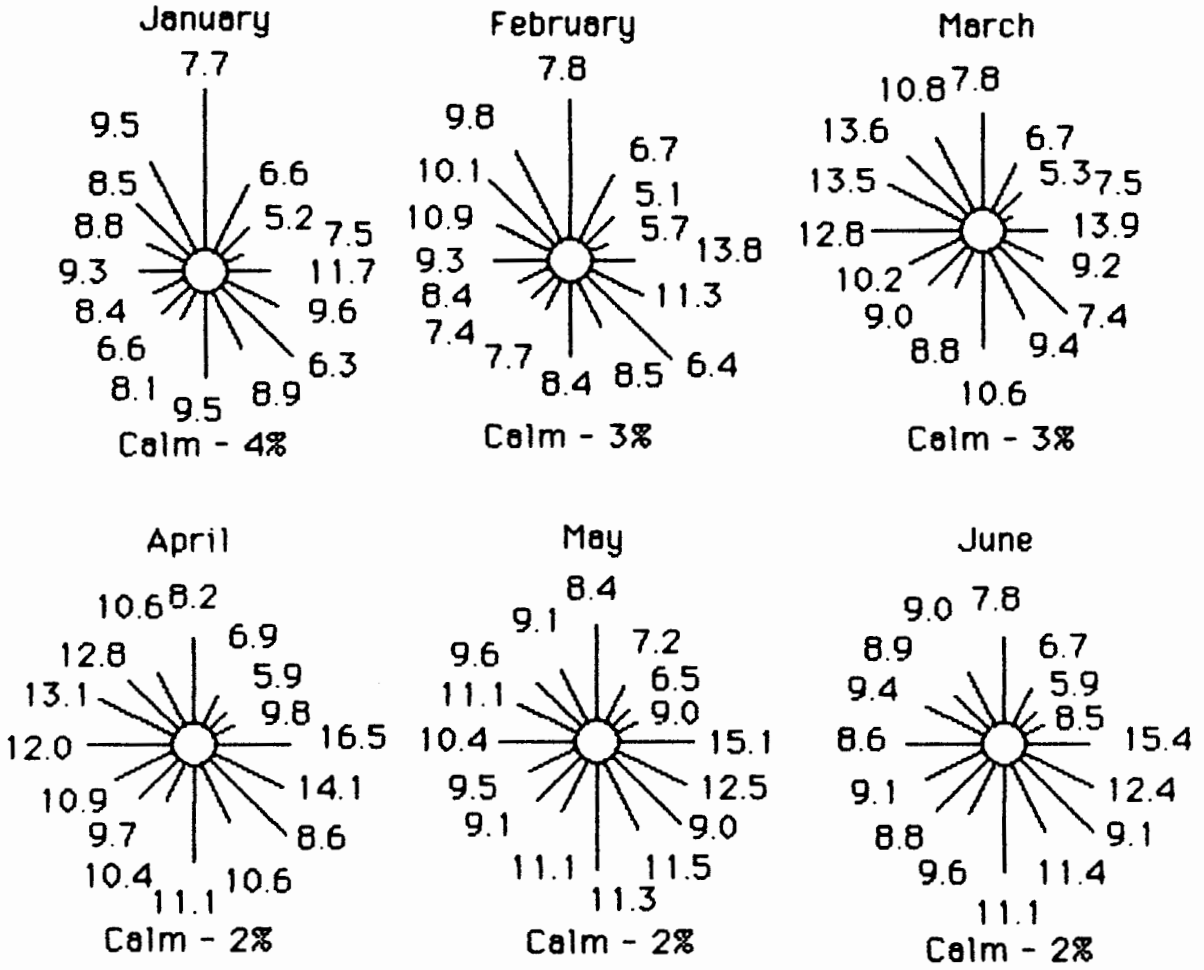
Figure 5 (page 11-12) Wind rose data for each month of the year (prevailing wind speed and direction)


Figure 4 - Topographic Map of the Facility Site

## Surface Wind Roses

Weather Bureau Airport Station
Albuquerque, New Mexico

Period of record: Jan. 1, 1949 - Dec. 31, 1958



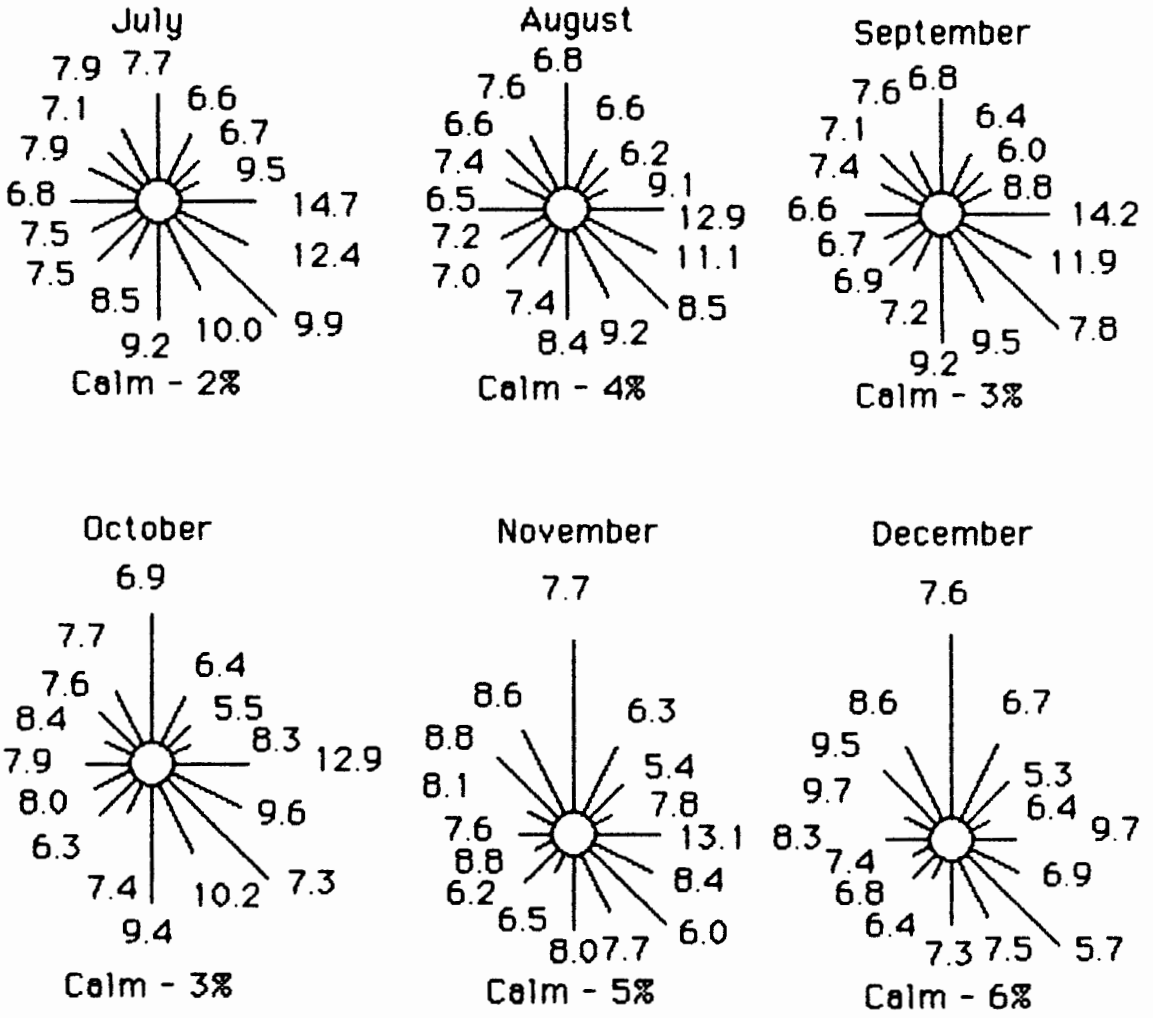

Percentages are measured from the circumference of the circle. These wind roses are based on hourly observations. The length of each line represents approximately the percentage of time that the indicated conditions exist. The numbers at the end of each line is the average hourly wind speed in that direction in miles per hour.

Figure A.5 - Wind Rose Data for Albuquerque, New Mexico

## Surface Wind Roses

Weather Bureau Airport Station

Albuquerque, New Mexico




Source: U.S. Department of Commerce, Weather Bureau, Reprinted in The New Mexico Wind Energy Resource, "Wind Summary, Albuquerque, New Mexico", 1977.

Figure A.5 - Wind Rose Data for Albuquerque, New Mexico (cont.)

The topography map shown in Figure 4 is a combination of two maps. The legal boundaries and surrounding land uses were obtained and copied from a county zoning map obtained from the Planning Division of the Municipal Development Department for the County of Bernalillo. This zoning map was adopted April 17, 1973. The contours that are in two feet intervals and the 100-year floodplain shown on this topography map were copied from a Floodway Flood Boundary and Floodway Map of the city of Albuquerque, Bernalillo County, New Mexico. The map was produced from topography generated by Bohannan-Huston, Inc., Albuquerque, New Mexico, and from existing topography acquired by the city of Albuquerque and the Albuquerque Metropolitan Arroyo Flood Control Authority. The effective date for this map was October 14, 1983.

The scale, as is shown in Figure 4, is one inch equals two hundred feet. The zoning map from the county planning division was the same scale as is shown. The floodplain map was enlarged to equal this scale and the contours and 100-year floodplains from the floodplain map were copied on the map shown in Figure 4.

There is at least one difference between the contours found on the floodplain map and the topography map found in Figure 4. The difference is the area around the facility. The topography found on the contour map did not take into account the change in topography that took place when the facility was built. As was mentioned earlier, the land under the building was elevated five feet in order to prevent potential contamination problems due to run-on and to the fact that

the facility was on the edge of a 100-year floodplain. The topographic map shown in Figure 4 takes into account the revised topography of the land around the facility after the land was elevated five feet from 4978 to 4983 feet.

The requirements fulfilled by the map are as follows:(1) map scale (the date has already been explained above), (2) 100-year floodplain, (3) surface waters including intermittant streams, (4) surrounding land uses, (5) orientation of the map, (6) legal boundaries of the HMW facility site, (7) access control (fences, gates), (8) buildings, treatment, storage, or disposal operations, and (9) location of operational units within HWM facility site where waste is stored.

Certain requirements need further explaination. No injection wells or withdrawal wells are shown because no wells are known to be in use within 1000 feet of the facility site. Several wells have been abondoned because of the lowering of the water table and availability of city water. This information was obtained from the Well Record in the State Engineer's Office. This was also confirmed by a survey of the residential areas in the 1000 feet radius of the facility site. The required wind rose data is shown in Figure 5. The only building that is on the property is the Rinchem distribution warehouse. All operations that concern the storage of organic solvent waste at this faility will be done in the southern half of this building.

D. Traffic [N.M. - 302.A.b(1)(j), Federal - 270.14(b)(10)]

FEB. 17 1987

D.1 Wastes Movements Routes

There is only one entrance into the Rinchem facility. This entrance is located 600 feet west of Edith Blvd. All the trucks accessing the Rinchem Company, Inc. facility approach the facility on Edith Blvd. The trucks turn west on a road and utility easement. This paved road is a private easement that is owned by the companies that are on both sides. The access road surface is asphalt. Since the road existed several years prior to the construction of the Rinchem facility, the exact specifications are not known. However, during that time 80,000 lb.GVW trucks routinely utilized the road. There seems to be no abnormal deterioration of the access road. The trucks proceed on this easement until they reach the gate of the Rinchem facility.

Traffic flow data prepared in 1985 by Middle Rio Grande Council of Governments shows that between Montano Blvd. and Osuna Rd. on Edith Boulevard N. E., the average traffic flow is 521 vehicles per hour.

The Rinchem Company, Inc. facility not only receives waste but also warehouses and distributes chemicals. Two types of trucks are used for these activities. Tractor/trailers are used to receive chemicals as well as transport wastes. These trailers can be tank, flat, or van trailers. The maximum axle weight for any of these rigs is 22,000 pounds and maximum gross weight is 80,000 pounds. Approximately 60 tractor/trailers per month enter and leave the Rinchem Company Inc. facility.

Smaller trucks are also used to distribute chemicals to customers and to transport wastes. These trucks vary in weight but generally gross up to 32,000 pounds. Approximately 120 smaller

D. Traffic [N.M. - 302.A.b(1)(j) , Federal - 270.14(b)(10)]

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FEB. 1 7 1987

D.2 Traffic Controls

During working hours, the access gate is kept closed. A stop sign is on the gate. The drivers are informed at this point by another sign that they must report in with the office before proceeding further.

After receiving permission from the office, the gate is opened and the wooden platform is removed to allow the truck to enter the loading area. The truck driver is escorted to the loading and unloading dock where the waste is transferred. The basic traffic movement is shown in Figure 6 (page 17).

As the trucks leave, another stop sign is located at the end of the easement immediately before turning onto Edith Blvd. This is to insure that no accidents will occur as the trucks turn onto Edith Blvd.

D.3 Road Surface Composition

The asphalt paving indicated in Figure 6 (page 17) was done in late 1983 as the building was completed. Because the land was elevated, the site was filled with earth compacted to 90% modified proctor to construct a building pad. The grade and surface was finished with 2" bituminous asphalt hot mix over a 4" inch gravel road base, and 6" prepared sitework.

The actual loading/unloading dock and the driveway leading to

D.2 Traffic Controls

During working hours, the access gate is kept partly closed. A stop sign is on a wooden barrier blocking the open half of the gate. The drivers are informed at this point by another sign that they must report in with the office before proceeding further.

After receiving permission from the office, the gate is opened and the wooden platform is removed to allow the truck to enter the loading area. The truck driver is escorted to the loading and unloading dock where the waste is transferred. The basic traffic movement is shown in Figure 6 (page 17).

As the trucks leave, another stop sign is located at the end of the easement immediately before turning onto Edith Blvd. This is to insure that no accidents will occur as the trucks turn onto Edith Blvd.

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Replaced by previous page

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The actual loading/unloading dock and the driveway leading to

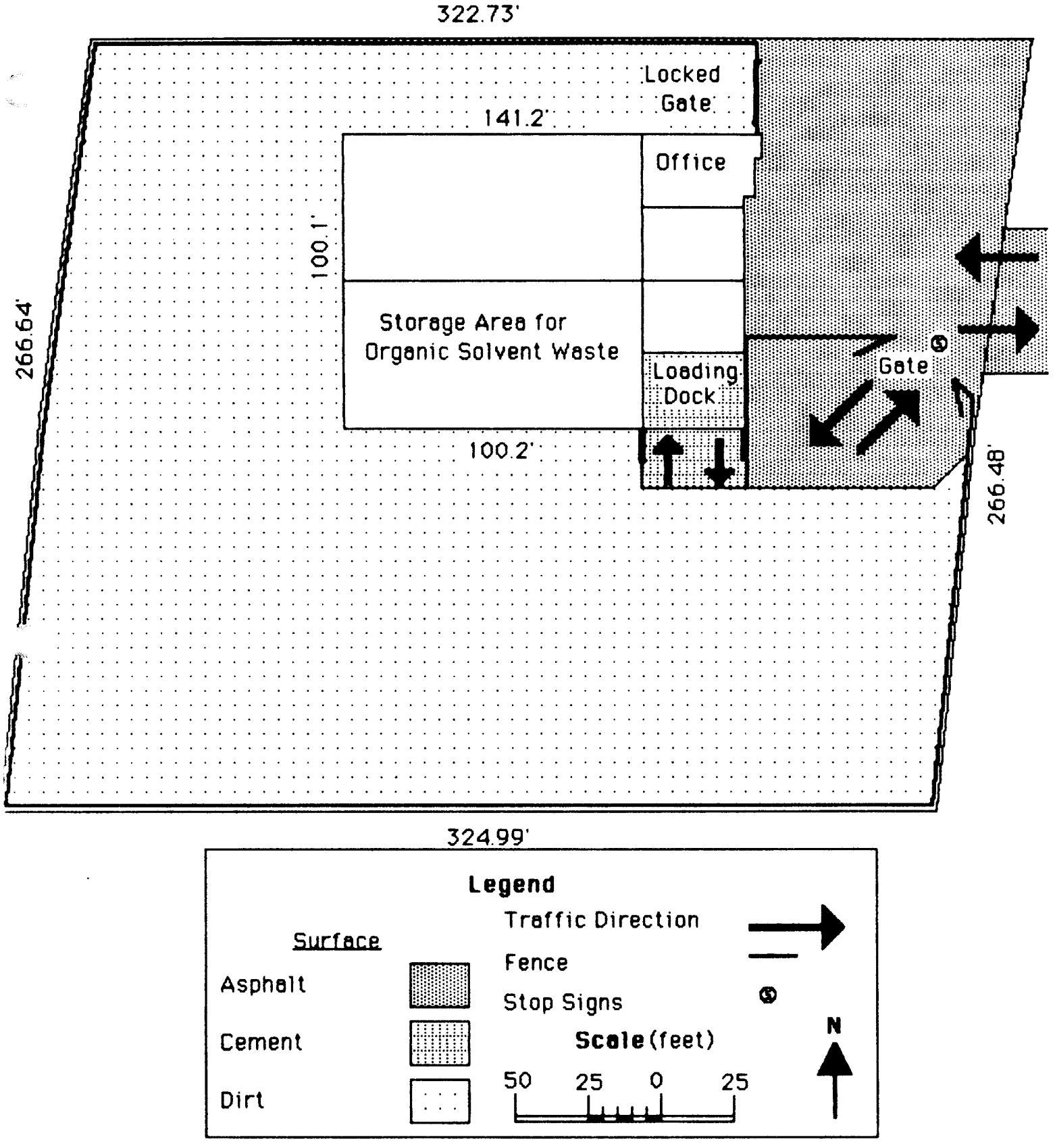



Figure 6 - Rinchem Facility Traffic Movement

the dock is cement. The cement is 3,000 PSI concrete. Grade 40 rebar was also used to increase the strength.

During the three years of facility operation, no truck has had problems with the roads. No significant rutting or wear can be seen on the road or yard surface. If any significant wear should occur, appropriate actions will be taken to insure that no traffic problems will occur.

## E. Preventive Procedures, Structures and Equipment

### E.1 Preparedness and Prevention

[N.M. - 302.A.4.b.(1)(f), U.S. - 270.14(b)(6) and Part 264 Subpart C]

#### E.1.1 Waiver of Preparedness and Prevention Requirements

[Federal - 280.14(b)(6)]

Rinchem Company, Inc. does not wish to request a waiver of the preparedness and prevention requirements under 40 CFR 264 Part C. The requirements of this subpart are addressed below. Detailed information about specific requirements of Part 264 Subpart C that are given in other parts of this permit application are also referenced below.

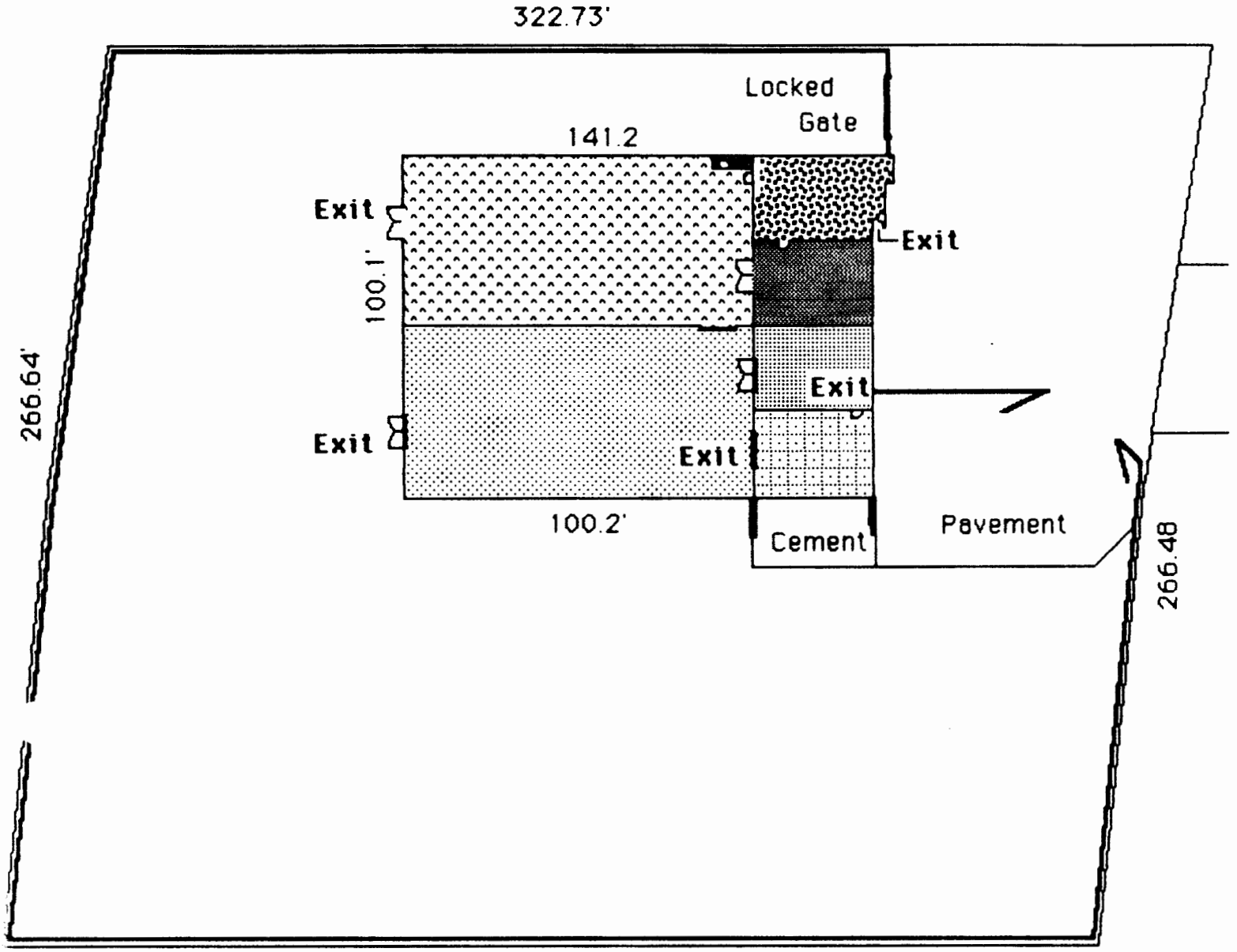
#### E.1.2 Preventive Facets of Construction [Federal - 264.30]

A schematic of this building is shown in Figure 7 (page 20).

This facility is specifically designed to warehouse chemicals to be distributed and chemical waste to be transported to a disposal site. The construction of the building was tailored with this purpose in mind. All interior hollow metal doors and frames meet the fire-resistive standards required for openings when located in separation walls. The wall dividing the building into a southern and northern half is a four-hour fire wall. The roll-up door installed in the four-hour fire wall is a three-hour fire-resistive door as indicated in National Building Code 1983. The other walls in the facility are two-hour fire walls. The outside doors in exterior walls are 24 gauge steel sectional doors and are manually operated. Combustible material is warehoused only in the southern half. This is to prevent a fire started in one half of the building from spreading to the other half and to prevent incompatible materials from combining accidentally.

The exits from the building are shown in Figure 7 (page 20). There is no place in the building over 75 feet from an exit. All rooms have at least two exits. Pathways to exits are kept clear and exits are clearly marked. All the doors can be manually opened in case of an emergency situation.

Two temperature controlled rooms are also shown in Figure 7 (page 20). These rooms are used to store chemicals that are sensitive to changes in temperature. These rooms are controlled within a range of ten degrees, i.e., 65-75° F.



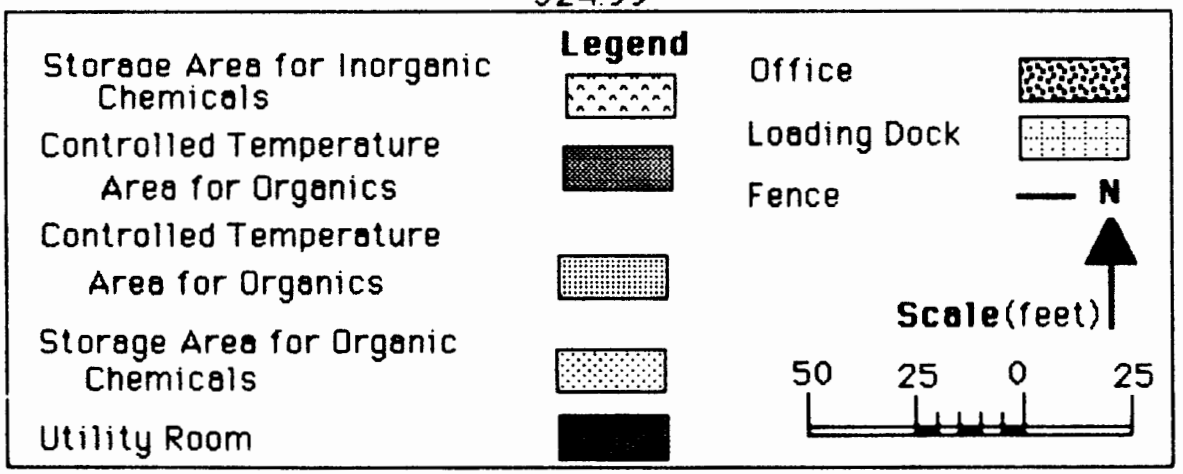




Figure 7 - A Schematic of the Rinchem Company, Inc. Building

at adequate volume and pressure.

E.1.3.1 Internal Alarm System [Federal - 264.32(a)]

The Rinchem Company Inc. has four different systems that could be used as an internal alarm system. (1) There is an electronic alarm system that could be used to alert the entire facility if an emergency arose. It includes two pull stations. The exact location of these pull stations is shown in Figure 8 (page 24). (2) An intercom could be used to inform workers if any emergency occurred. (4) The building is small enough that shouting could be used as an alarm system as well. (4) A claxton horn (very loud buzzer) is connected to each telephone in the building. Six or more buzzes is designated as the signal for emergency evacuation.

E.1.3.2 External Alarm System [Federal - 264.32(b)]

There are two systems that could be used if an emergency arose at the Rinchem Company Inc. building. The first system is the telephone system. Several telephones and four outgoing lines are available in summoning aid. A notice listing phone numbers of the nearest medical emergency treatment facility, fire department, police station, ambulance service, and the New Mexico Emergency Response Team is posted near each phone in the building.

The second system that could be used is the electronic alarm system at the Rinchem Company, Inc. building. This outside alarm

system is connected to the fire sprinkler, temperature control equipment, windows and doors, and the two pull stations. If the system is activated, a signal is sent out to a secured monitoring station at San Mateo Blvd. and Central Avenue in Albuquerque, New Mexico. The station is continously monitored. A list of important phone numbers is kept at this facility. It includes the closest fire department, sheriff's office and responsible company personnel. Phone numbers and more detailed information about the exact response team that would be assembled is found in the Contingency Plan (pg. CP-4).

E.1.3.3 Fire, Spill, and Decontamination Equipment
[Federal - 270.14(b)(6) and 264.32(c)]

Six dry chemical fire extinguishers are located in the warehouse building. The exact location of the fire extinguishers in the building can be seen in Figure 8 (page 24). An extinguisher is within 75 feet of any storage or handling area on the site. Also Rinchem vehicles carry fire extinguishers in the cab. The entire building is protected by a dry pipe water sprinkler system. This sprinkler system also has a double fireman's hookup so that the fire department can inject foam into the sprinkler system when they arrive.

Equipment used in decontamination and spill control is also found in the Rinchem Company building. Five emergency showers and eye wash fountains are available, one in each chemical storage area plus the dock. A unit is no further than 100 feet from any storage or handling area in the building. The exact location of each of these

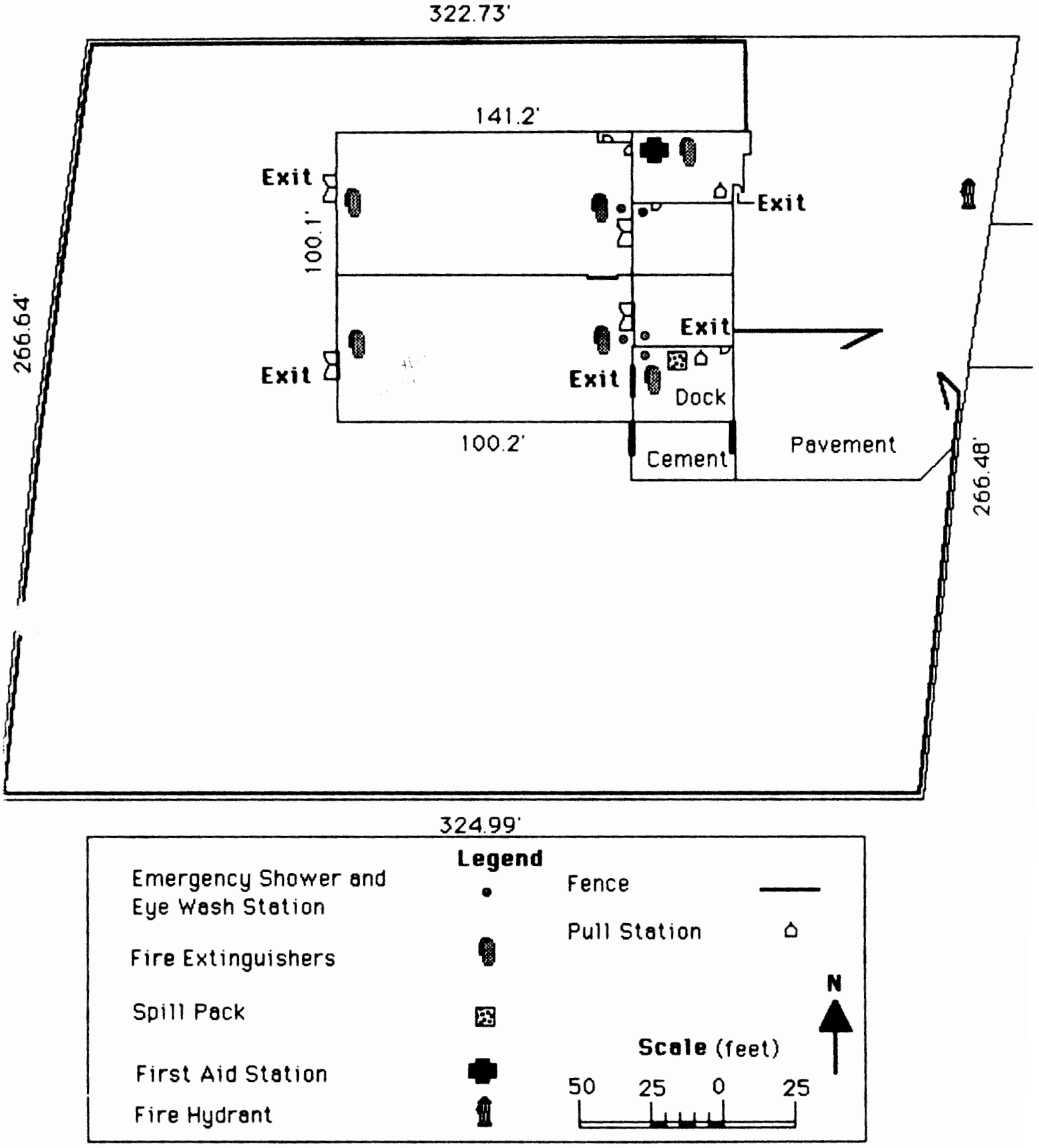



Figure 8 - Location of Fire, Spill and Decontamination Equipment

emergency showers and eye wash stations can be seen in Figure 8 (preceding page).

Employees are also provided with goggles, hard hats, respirators and rubber aprons. In addition, the building and each vehicle is equipped with a SPILPAC. Each SPILPAC contains the following items:

1. Tyvex suits- (with hood) used to protect the worker's body from exposure to hazardous waste.
2. Goggles - used to protect the worker's eyes from exposure to waste.
3. Boot covers - used to protect the worker's feet from exposure to hazardous waste.
4. Respirator - used to protect worker's lungs from exposure to hazardous fumes.
5. Solvent gloves - used to protect worker's hands from exposure to hazardous waste.
6. Absorbent - used to absorb the hazardous waste.
7. 10 ml polyethylene plastic ( 10 X 20 ft.) - used to contain hazardous waste spills.
8. Shovel - used to clean up spilled hazardous waste and area contaminated by hazardous waste spills.
9. Broom - used to clean up spilled hazardous waste.
10. Soda ash - used to neutralize the hazardous waste.
11. 85 gallon overpack drum - used to contain a defective hazardous waste drum.
12. Duct tape - used to temporarily seal a leak in a waste drum.

13. Drum pump, hand operated - used to pump spill into suitable container.
14. Labels and manifests - used to mark the contents of the drums that were used to clean up the spill.

The location of the SPILPAC in the building is found in Figure 8 (page 24). Extra supplies are stored in the Rinchem facility to insure that each SPILPAC is constantly stocked with all the required items and to provide back up for response to a large spill.

The drum pumps in the SPILPAC's are steel tube & plunger with Buna N, Viton or teflon packings and seals. They are designed for petroleum products and though useful life is reduced by harsh solvents, they are adequately compatible for emergency response with all of the solvents and oils covered by this permit.

A customized first aid cabinet has been provided and is routinely stocked. The cabinet is in the lunch room and is appropriately marked "First Aid Station". It is near the offices so that help for an injured person is readily available. The location of the first aid station is also shown in Figure 8 (page 24).

E.1.3.1 Water at Adequate Volume and Pressure [Federal - 264.32(d)

When the facility was built, the contractors installed a fire hydrant in the road easement near the existing end of the city main water line. Hook-ups were installed above the checkvalve in the system riser for fire department access. This provides more than enough water at adequate pressure and volume to fight a fire. The exact location of the fire hydrant is also shown in Figure 8 (page 24).

13. Drum pump, hand operated - used to pump spill into suitable container.

14. Labels and manifests - used to mark the contents of the drums that were used to clean up the spill.

The location of the spill pack in the building is found in Figure 8 (page 24). Extra supplies are stored in the Rinchem facility to insure that each SPILPAC is constantly stocked with all the required items and to provide back up for response to a large spill.

A customized first aid cabinet has been provided and is routinely stocked. The cabinet is in the lunch room and is appropriately marked "First Aid Station". It is near the offices so that help for an injured person is readily available. The location of the first aid station is also shown in Figure 8 (page 24).

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E.1.4 Equipment Testing and Maintenance [Federal - 264.33]

The equipment that has been described in the preceding section undergoes inspection at regular intervals. The fire extinguishers are inspected by an outside service every month or after the extinguishers have been used. The equipment used for decontamination and spill control are also inspected. The SPILPAC are inspected every third month or after a spill to insure that all the required items are present. The first aid kit is also inspected at regular intervals to make sure that all required items are present. The details and procedures used to inspect and maintain this emergency equipment is given in the Inspection Section of this permit (page 46).

E.1.5 Access to Internal and External Alarms [Federal 264.34(a)(b)]

In the Rinchem Company Inc. plant operation, each person has easy access to internal alarms. The pull stations and intercom are located in areas where the personnel would pass in order to exit the building. In addition, an automatic alarm would go off if certain emergencies occurred.

Access to external alarms are realized by the telephones that are located in areas where personnel would pass in order to exit the building. The telephones are located in the office area. In case of fire, an automatic alarm would send a signal to the secured monitoring system already mentioned. This could be used to alert outside response teams should access to the telephones be impossible.

E.1.6 Aisle Adequacy [Federal - 264.35] FEB 17 1987

Aisles within the building provide access to storage areas. The aisle width is maintained at 120 inches. Aisle boundaries are clearly marked. Workmen are instructed to keep aisles clear of obstruction at all times. Drums of covered waste are generally stacked in rows that are two drums (4 feet) wide and not more than 12 drums (24 feet) long. Rows are seperated by approximately 6" to 8" to provide easy access of fork lift trucks for drum movement and inspection.

E.1.7 Arrangements with Local Authorities
[Federal - 264.37 and 264.52(c)]

Meetings were held between management and local fire, police, and emergency response officials. Tours of the facility were conducted and layouts were given to the appropriate authorities. They have also noted the hazards connected with the Rinchem facility. Fire department officials have visited the site and have observed site access routes, the locations of high risk areas, and have inspected fire protection capabilities including sprinkler systems and water supplies. Employees of Rinchem are registered with Heights General Hospital to provide for immediate admittance without pre-registration delay. Rinchem employees are to call the hospital and alert them and the ambulance service, if any, of any contamination and the nature of the injury, as well as the name of the employee. A more detailed discussion of the agreements made with each of these agencies is found in the Contingency Plan (page CP-23).

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E.1.8 Agreement Designating Primary Emergency Authority

[Federal - 267.37(a)(1)]

An agreement designating primary emergency authority in the case of an emergency at the Rinchem Company, Inc. is in accordance with the New Mexico State Emergency Response Plan and the Emergency Management Plan for Albuquerque & Bernalillo County, N.M. In the case of a major fire or hazardous material disaster the Senior Operating Fire Department personnel will assume command of the field Incident Command and provide direct assistance, planning, and information control to the scene.

The Albuquerque and Bernalillo Fire Department will coordinate joint use of all fire protection services within the City/County. They will also coordinate reciprocal assistance agreement for fire services in areas surrounding the City/County.

E.2 General Hazard Prevention

[N.M. - 302.A.4.b.(1)(h), U.S. - 270.14(b)(8)]

The Rinchem Company Inc. is operated and equipped with a variety of features and procedures that minimize the potential for the following hazards:

(1) Hazards during unloading operations.

(2) Runoff from waste handling areas.

(3) Contamination of water supply.

(4) Hazardous situations caused by equipment failures and/or power

outage.

(5) Undue exposure of personnel to hazardous wastes.

Personnel safety is of great importance and is stressed at all times at the Rinchem Company Inc. facility.

E.2.1 Hazards During Unloading

[ N.M. - 302.A.4.b.(1)(h)(i), U.S. - 270.14(b)(8)(i)]

Unloading hazards are reduced through procedures and equipment used at the Rinchem facility. Before loading drummed wastes at a generator's facility, drums are checked for soundness, proper sealing and labeling, and compliance with DOT standards by a trained employee of Rinchem Company, Inc. Any damaged drums that might leak or burst during unloading of the waste drums are not accepted for transportation to the Rinchem facility. This minimizes the potential for container failure during unloading due to substandard conditions of the drums.

Drummed wastes are unloaded and loaded onto trucks at only one location on-site (Refer to Figure 7 page 20). The truck dock at the Rinchem facility is equipped with a mechanical dock leveler for entering trucks and trailers. Rinchem also maintains a 3000 pound capacity gas-safety forklift and dolley specifically designed for drum carrying. Drums need not be lifted more than a few inches above the bed of a trailer before the forklift can back away and lower the drums to a few inches above the floor of the loading dock. In this way, if a drum were to be dropped, the fall distance would be minimized such

that the structural integrity of the container would not be threatened. All chemicals that enter or leave the Rinchem Company, Inc. facility are handled over the sloped and drained concrete of the loading dock. Small trucks drive over the berm onto the dock from the east. Longer trucks back up to the dock, parking on the sloped and bermed concrete apron to the south. Either area can contain a 1000 gallon spill within the concrete.

In the case of an accidental spill while loading/unloading the drums, the steps found in the Contingency Plan for spills (page CP-9) will be followed in order to insure that the emergency is dealt with quickly and efficiently.

E.2.2 Run-Off from Waste Handling Areas

[ N.M. - 302.A.4.b.(1)(h)(ii), U.S. - 270.14(b)(8)(ii)]

To prevent run-off from hazardous waste handling areas to other areas of the facility or environment and to prevent flooding, the following procedures are utilized:

(1) All waste handling areas are paved with concrete. These areas are sloped so in the event of a spill or release of material, the flow of this material is contained and drained to an appropriate storage container.

(2) The storage area for the hazardous waste is situated inside the building. This allows the hazardous waste to be protected from the elements.

(3) As was mentioned previously, the land under the building was

elevated five feet above the surrounding land. This allows any rain that might land near the building to flow away instead of toward the building.

(4) In the event of steady rain, the Rinchem building's roof is sloped and is equipped with a gutter system. The storm system transports the rainwater twenty to thirty feet west of the facility where the rainwater can flow from the facility in a southwesterly direction. Figure A.4 is a topography map which shows the prevailing surface water flow in a 1000 feet radius around the facility (page 10).

E.2.3 Contamination of Water Supply

[ N.M. - 302.A.4.b.(1)(h)(iii), U.S. - 270.14(b)(8)(iii)]

Wastes are not handled or stored beyond the boundaries of designated, fully-contained areas. Should a minor spill or leak occur within a containment area, steps would be taken as are outlined in the Contingency Plan (page CP-9). Clean-up procedures would be instituted immediately to decontaminate the concrete base. In this way, ground-water contamination is prevented by eliminating the discharge of hazardous materials onto the unprotected ground.

In order to monitor any potential problems with groundwater contamination, a two inch monitoring well has been installed near the southwest corner of the facility. The initial water samples were analyzed in August, 1983 by New Mexico Environmental Improvement Division. The monitoring well is sampled semi-anually and tested for pH, total dissolved solids, and total organic carbon. If any appreciable

entrances to waste storage and handling areas. No matches or lighters are to be used in these areas. Welding, cutting and other high temperature operations are not allowed near the vicinity of the storage area.

### E.3.2 Handling Procedures for Ignitable, Reactive, and/or Incompatilbe Wastes [Federal - 264.17(b)]

The Rinchem facility has a combination of design and procedural measures to prevent accidental ignition or reaction of ignitalbe, reactive, or incompatible wastes. These measures are designed to separate and protect wastes from sources of ignition and reaction. They have partially been explained in the preceding subsection. Procedures which are used include:

(1) In order to decrease hazards caused by storing incompatible wastes, the facility is designed to allow complete physical separation and secondary containment of incompatible materials.

(2) Drummed waste materials are stored only in closed DOT approved containers. These contaniners are not opened unless sampling or repackaging is necessary. Opening of containers is strictly prohibited in the storage areas. Sampling and transfer operations are conducted on the shipping dock for maximum ventilation. Specific details of the sampling process is given in the Waste Analysis Plan (page WAP-9).

(3) The storage areas for the drums is in the Rinchem building. This allows protection of the waste from extreme heat, cold, and sunlight.

(4) The floor of the storage area is 4" minimum thickness of high density concrete covered with three coats of chlorinated rubber sealer. The floor has a ~3% slope to its drains, to allow quick run-off and containment of spills. The sealer is not highly solvent resistant, but eases the clean-up of dust, solid spills, and absorbents.

(5) No cutting, welding, or other open flames are permitted near the waste storage area.

(6) Emergency notification equipment is located adjacent to the storage area (Refer to Figure 8, page 24). Rapid response, therefore, is possible in the event of problems such as spills, and/or fires.

(7) No heaters are installed near storage areas.

(8) Water of sufficient volume to combat fires, if appropriate, is available at various locations on-site. A fire hydrant is located on site near the main entrance into the Rinchem facility (Refer to Figure 8, page 24).

(9) The compatibility of containerized wastes will be ascertained on the basis of information on the generator's manifest, from the results of tests on the generator's sample, from statistical sampling of each incoming shipment, and from the literature. If, based on any of the above information, an incoming load of drums is inappropriate for the designated storage area, the shipment will not be accepted for storage.

(4) The storage area is over concrete that is covered with a protective material. The allows the clean-up of an accidental spill to be quick and efficient.

(5) No cutting, welding, or other open flames are permitted near the wastes storage area.

(6) Emergency notification equipment is located adjacent to the storage area (Refer to Figure 8, page 24). Rapid response, therefore, is possible in the event of problems such as spills, and/or fires.

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(10) Routine inspections of drums and drum storage areas allow site personnel to identify potential problems before they occur. A more detailed discussion of this inspection is found in the Inspection section of this permit application (page 46).

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E.3.3 Description of Warning/Prohibition Signs

Smoking, and use of matches, and lighters are not permitted anywhere in the facility except in a designated smoking area in the administrative office. Signs bearing the legend "NO SMOKING" are displayed prominently throughout the facility with the exception of the designated smoking area. Figure 9 (page 41) shows the designated smoking area as well the location of the signs bearing the legend "NO SMOKING."

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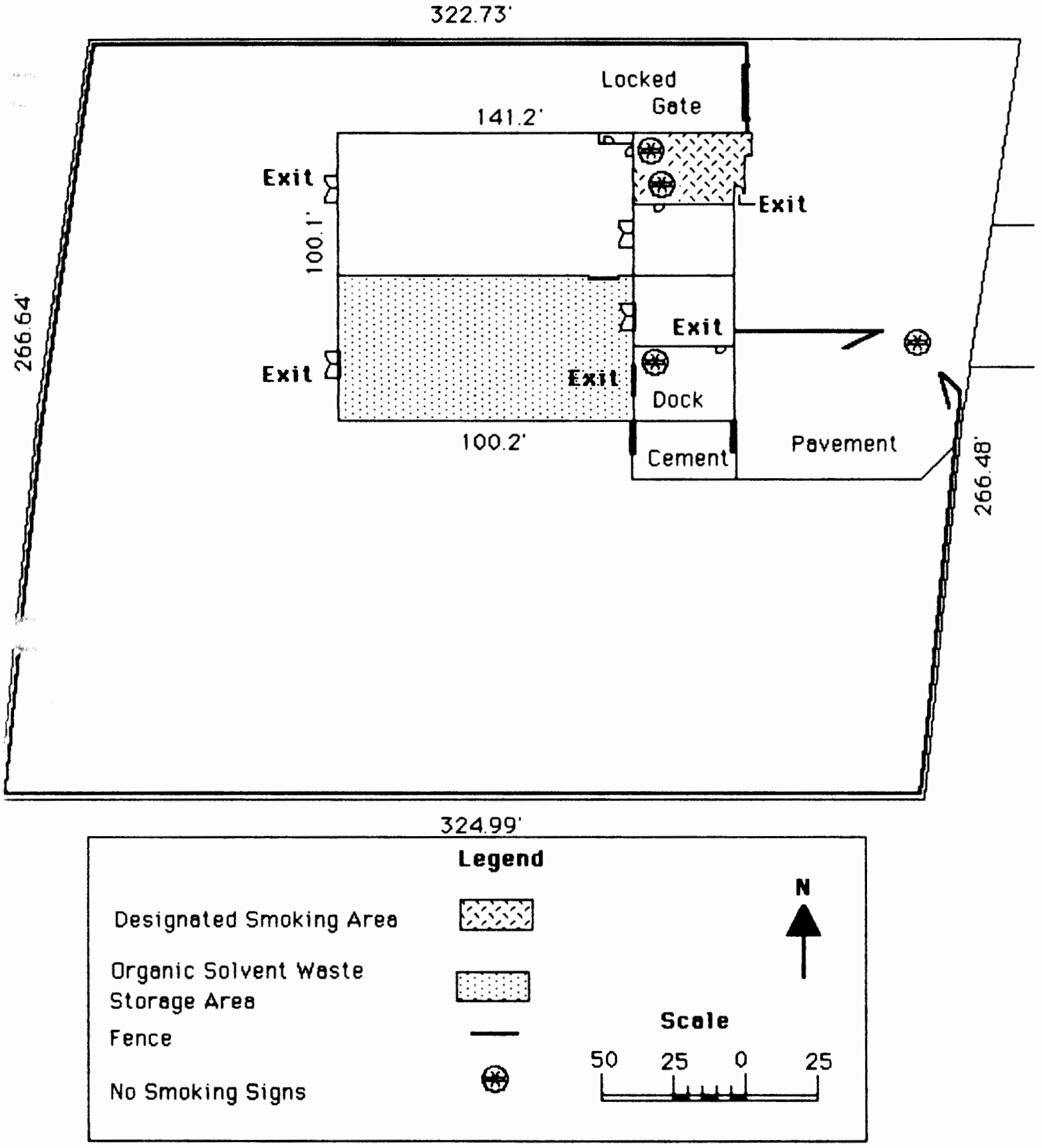


Figure 9 - No Smoking Signs and Designated Smoking Area

# II

# Security

## II. Security [N.M. - 302.4.b.(1)(d), Federal - 264.14(b)(4)]

A. Security Procedures Waiver Justification [Federal - 264.14(a)]

Rinchem Company, Inc. does not wish to request a waiver of the security procedures. Detailed information about the security procedures employed at the Rinchem facility are addressed below.

B. Description of 24-hour Surveillance System and/or Artificial or Natural Barriers [Federal - 270.14(b)(4) and 264.14(b)]

The Rinchem Company, Inc. facility employs a number of measures to ensure adequate security in order to comply with government regulations and to assure the protection of the facility.

The above-mentioned facility has an alarm system that is connected by phone to a secure monitoring station. The alarm system is connected to each window and door, the fire sprinkler system, the temperature control system, and the pull stations. This monitoring system is manned 24 hours a day and is located on the top floor of a building located on the corner of San Mateo and Central in Albuquerque, New Mexico. A list of important phone numbers is kept at this monitoring system should an emergency occur.

The entire facility including the outside area around the building, is maintained in a secure manner. A fence encompasses the entire facility. The fencing utilized to surround the facility is constructed of

6 foot high, fabric light gage, 2" mesh chain link fence. The fence is topped by coils of concertina wire. Figure 10 shows the location of the fence around the facility (page 44).

Access to the facility which is surrounded by the fence is by means of two gates. Trucks carrying hazardous waste gain access to the unloading/loading dock area by way of a 20-foot gate constructed of materials similiar to the fixed fencing already described. This access gate is part of the fence to the east of the office and loading dock. The gate to the north of the office is opened only on rare occasions to allow for maintainence of the yard area.

Both gates are maintained in a closed and padlocked condition during all periods of facility non-working hours. During working hours, the opened gates are observed at all times by office personnel located at windows on the east side of the building and from personnel that are working on the loading/unloading dock. Access through the open gate is blocked by a barrier with a stop sign informing the truck drivers to check in with the office before entering. The receptionist, immediately inside the office entrance door, confirms identification of all visitors and the purpose of their visit. Visitors are not allowed in the warehouse without an employee accompanying them.

Inspections are made of the fence, gate, and the alarm system at regular intervals. A detailed description of the inspections that are completed as well as the frequency of these inspections are found in

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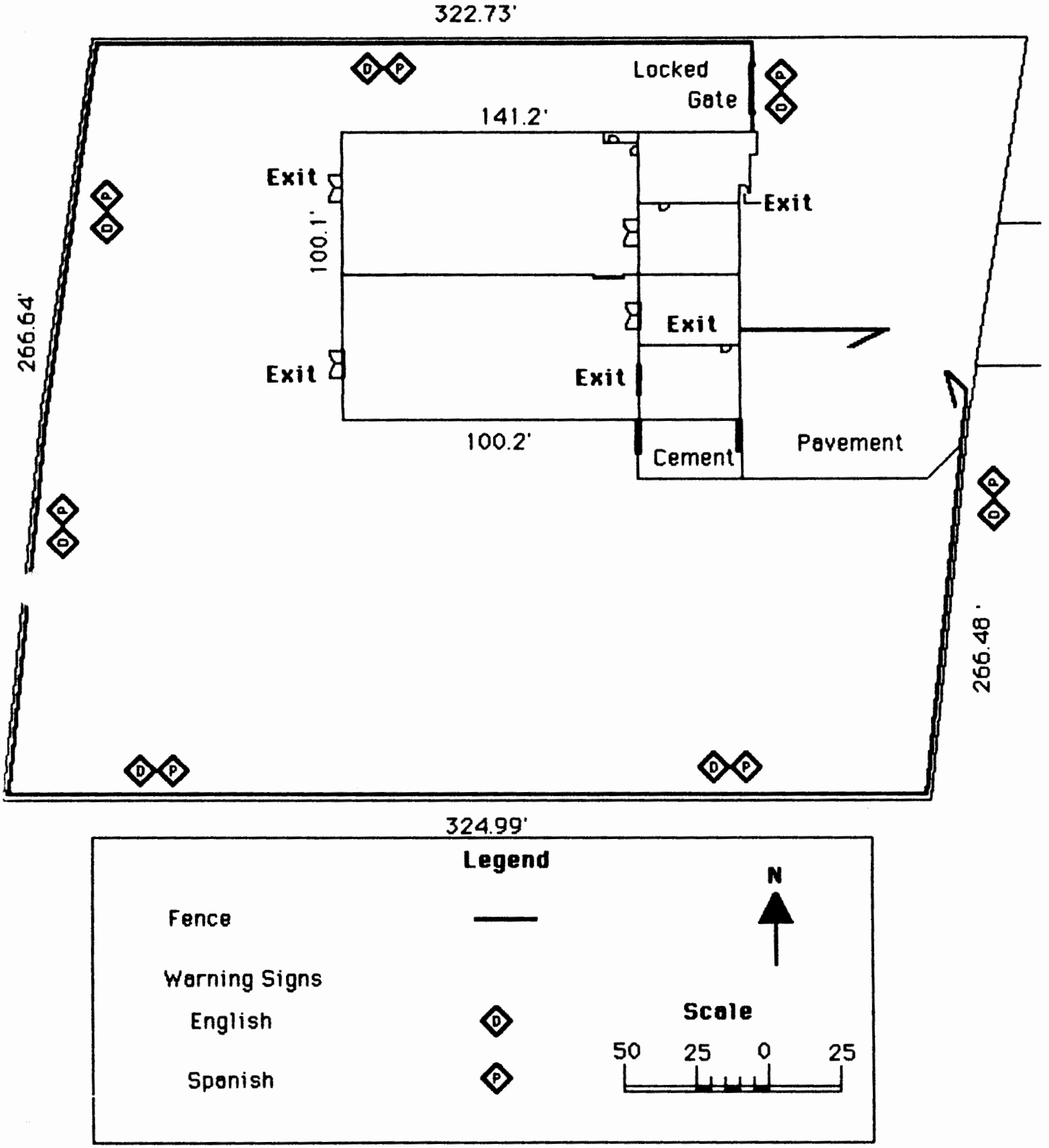


Figure 10. Security Measures at the Rinchem Facility

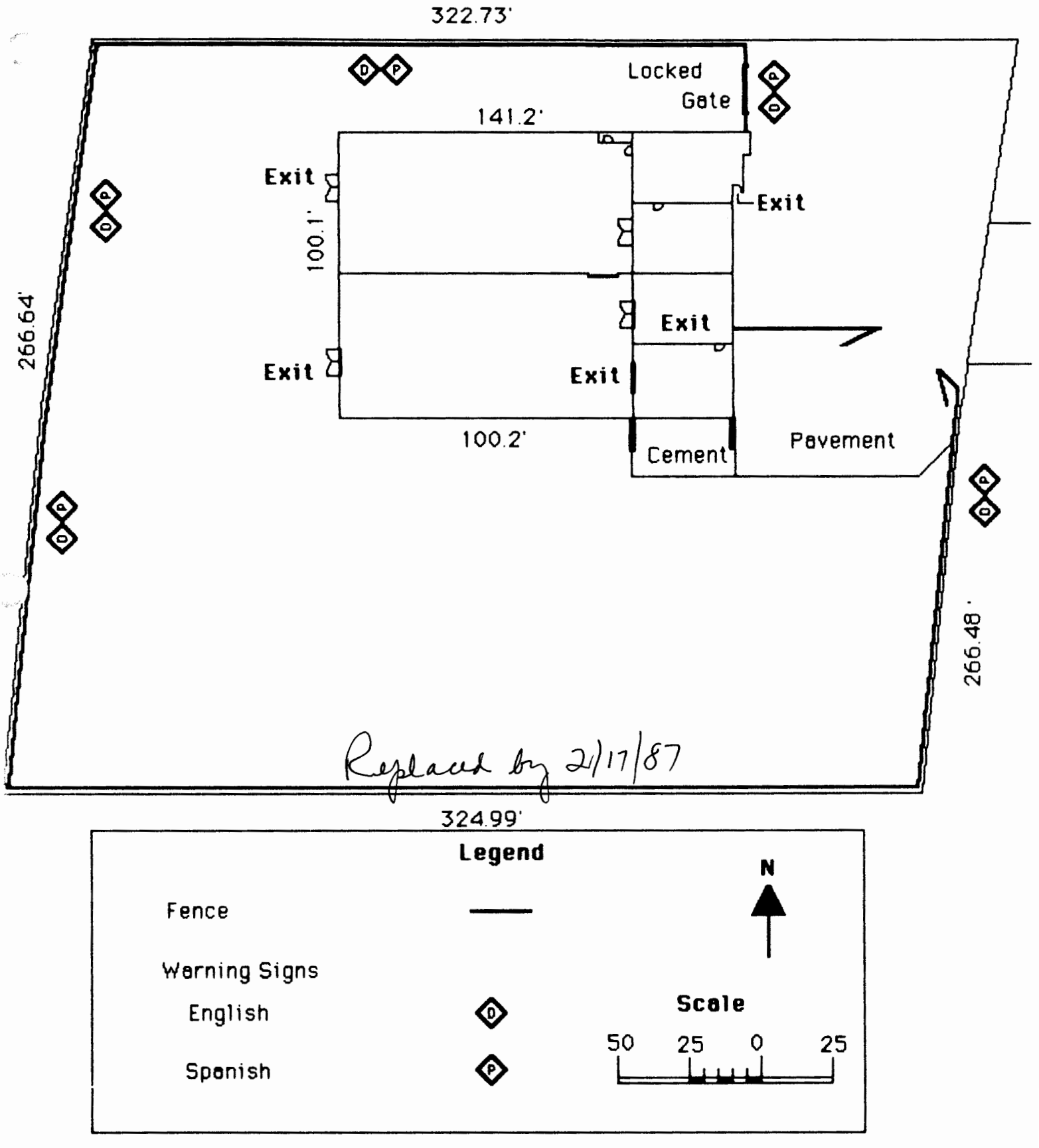


Figure 10. Security Measures at the Rinchem Facility

the Inspection section of this permit application (page 46).

Doors and gates are maintained in a locked and a secure position during non-working hours and on weekends. All critical locks and the electric alarm code are changed when an employee leaves the company, or when a key is lost.

C. Description of Warning Signs [Federal - 264.14(c)]

Warning Signs are posted at the east gate and several other fence locations around the facility in such a manner to be visible from all angles of approach, and bear the legend in English, "Danger - Unauthorized Persons Keep Out." Warnings signs in Spanish are posted next to the English warning signs and bear the legend " PELIGRO Personas Sin Autorizacion NO ENTRAN". All signs are legible from a distance of 25 feet. The exact location of these safety signs are shown in Figure 10 (page 44).

# III

# Inspection

## III. Inspection [Federal - 270.14(b)(5), N.M. - 302.A.4.b.(1)(e)]

A. General Description

As a result of Rinchem Company, Inc. being only a distributor of chemicals (no manufacturing, no processing), this facility will employ only a limited variety of equipment in its daily business. Because of the type of activity that is undertaken, the inspection activity required is low in comparison to that required in a processing or manufacturing business. However, a number of regular and routine inspections are carried out on that equipment that is involved in the daily business. Futhermore, inspections are conducted on safety equipment which might be required in emergencies to ensure that these items will be operable and ready if an emergency occurs.

B. Identification of Equipment/Processes to be Inspected [Federal - 264.15(b)(1)]

Figures 11-14 list the items which are routinely inspected (pages 51-55). The items selected allow a worker to carry out tasks of both a routine and nonroutine nature in such a manner to ensure the employee's safety and to prevent any threat to the public and/or the environment.

C. Identification of Types of Problems for Each Equipment/Process to be Inspected. [Federal - 264.15(b)(3)]

Figures 11-14 list, along with the items which are routinely

inspected, the types of problems which could be present or cause an item to be non-functional. Each item is inspected for each type of problem that would make the item non-functional.

D. Frequency of Inspections [Federal - 264.15(b)(4)]

Figures 11-14 also indicate the frequency with which the items are inspected. It should be noted that some equipment might be inspected more than the regular amount shown in these figures. For example, emergency equipment when used should be inspected immediately. The inspection schedule shown is the maximum amount of time that will occur between subsequent inspections for each item.

E. Written Schedule [Federal - 264.15(b)(1)]

All equipment, devices, and structures that are inspected are found in a written schedule of inspection. The written inspection is used at the Rinchem facility to ensure that all the necessary items are in good working order and the emergency equipment will be functional should an emergency occur. The inspection schedules are divided up by the time intervals of the inspections. There is a weekly, quarterly, and semiannual schedule. Each inspection schedule form includes the following information: (1) item inspected, (2) date of inspection, (3) name of inspector, (4) observations, (5) remedial action (if necessary), (6) data repair completed (if required), and (7) supervisor's signature. The weekly schedule is completed at the end of each working week. The

quarterly schedule is completed on the final working day of each third month. The semiannual schedule is completed in June and December of each year. Figures 12-14 are examples of these written inspection forms that are used by Rinchem Company, Inc. In addition, each waste shipment is inspected using a Pre-Acceptance Inspection Sheet. Figure 11 (page 51) is an example of this inspection sheet.

F. Inspection Schedule and Records [Federal - 264.15(b)(2) and 264.15(d)]

Inspection schedules are maintained and kept at the Rinchem Company, Inc. facility. The format of these different inspection schedules are shown in Figures 11-14 (pages 51-55). The completed inspection schedules are maintained for a period of three years from the date of inspection. Any extraordinary occurrances such as a waste release or fire requires a written report which shall be kept on file at the facility as well as being forwarded to the appropriate agencies as outlined in the Contingency Plan (page CP-23). The records will be open to inspection to the appropriate state and federal authorities during normal business hours.

G. Schedule of Remedial Action [Federal - 264.15(c)]

As has been mentioned, Figures 11-14 (pages 51-55) are examples of the inspections schedule forms that are used at the Rinchem Company, Inc. The inspector checks the status of each item and makes a decision as to its being acceptable or unacceptable. If

Rinchem Company, Inc. personnel during a routine inspection find that a condition of a non-emergency nature is present which requires some type of maintainence in order to bring the particular item into compliance with inspection standards, it shall be that employee's responsibility either to bring that item into compliance or to bring the defective item to the attention of his immediate supervisor in order to correct the deficiency. All remedial actions are to be performed promptly to diminish the potential for further deterioration of equipment, and/or hazard to the personnel and/or environment. Remedial actions are noted on the inspection schedule forms along with the date the repair is completed.

If during an inspection a situation would be found which is of an emergency nature, or has the potential to become such, the employee will immediately initiate remedial action as well as notify the Emergency Coordinator. The Emergency Coordinator shall carry out his/her actions for the specific emergency as outlined in the Contingency Plan (page CP-5). In the event of a hazardous waste spill, the objective shall be to contain, isolate, clean-up, and decontaminate the affected area with utmost concern for minimizing risk to Rinchem Company, Inc. workers, the public, and the environment. The necessary documentation and reporting will be written and submitted to the appropriate authorities.

H. Inspection of Containers [Federal - 264.174]

According to the regulations, at least weekly, the owner or

operator must inspect areas where the containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. Rinchem's Inspection Schedule provides for weekly inspections of the containers and the containment system to ensure that no defective containers or problems with the containment system will go unnoticed.

I. Other Specific Inspection Requirements

Rinchem Company Inc. does not utilize tanks of any sort for the storage of waste materials. Thus, the regulations pertaining to inspection of this type of equipment are not applicable. This facility likewise does not utilize waste piles, or surface impoundments, or incinerators, as means of managing wastes, and the regulations pertaining to inspections and the logging of such inspections are not applicable to the Rinchem facility.

RINCHEM COMPANY INC.

# PRE-ACCEPTANCE INSPECTION SHEET

PHONE (505) 345-3655
COMPANY INC.
6133 EDITH BLVD.NE
ALBUQUERQUE NM 87107

**A. GENERAL INFORMATION**

GENERATOR NAME _____

FACILITY ADDRESS _____ NUMBER _____

_____ GENERATOR USEPA I.D. _____

_____ GENERATOR STATE I. D _____

TECHNICAL CONTACT: _____ TITLE: _____ PHONE: _____

NAME OF WASTE: _____

PROCESS GENERATING WASTE: _____

Inspector's name_____/_____Date of Inspection _____

| TYPES OF PROBLEMS | STATUS ACCEPTABLE (A) OR UNACCEPTABLE (U) |
|---|---|
| Stored Containers | |
| - Check manifest compliance to instructions in Schedule A | ☐A ☐U |
| - Yellow Hazardous Waste labels on drums match data on manifest | ☐A ☐U |
| - Check for appropriate DOT hazard labels | ☐A ☐U |
| - Ensure all inappropriate labelling is removed or painted out | ☐A ☐U |
| - Check drums for the following: | |
| a. DOT approved containers only (Check for DOT stamp on odd looking drums) | ☐A ☐U |
| b. Appropriateness for material (generally, closed head drum - liquid, metal drum - organics, poly or poly-lined drum - corrosives) | ☐A ☐U |
| c. No leaks, bungs sealed, no deep dents or creases, filled at least 24 hours before pick up of the shipment | ☐A ☐U |
| d. No liquids or dried waste on exterior (including top) | ☐A ☐U |
| - Before signing manifest, confirm quantity of each stream (number of items received and loaded same as number manifested) | ☐A ☐U |

It is vital to be firm, but very courteous when dealing with customers regarding suspected discrepencies. If they don't readily agree that changes are necessary, ask for permission to contact your supervisor. We do not reject shipments without every effort to rectify non-compliance and we do not accept shipments until they comply.

Figure 11. Pre-Acceptance Inspection Sheet

**Rinchem Weekly Inspection Sheet**

Inspector's name _____ Date of Inspection _____

| ITEM | TYPES OF PROBLEMS | STATUS ACCEPTABLE (A) OR UNACCEPTABLE (U) | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION |
|---|---|---|---|
| Container Loading/ Unloading Area | - Check that no containers of hazardous waste are left open or exposed overnight | ☐A ☐U | |
| | - Check for evidence of spilled material on concrete below truck and on dock | ☐A ☐U | |
| | - Check for debris and refuse | ☐A ☐U | |
| Container Storage Area | - Check for evidence of spilled material on concrete floor, drains, walls | ☐A ☐U | |
| | - Check for debris and refuse | ☐A ☐U | |
| | - Check adequacy of aisle space | ☐A ☐U | |
| Stored Container | - Check for drum leaks or swelling | ☐A ☐U | |
| | - Checks that drums are not open | ☐A ☐U | |
| | - Check for proper placement | ☐A ☐U | |
| Security Equipment | | | |
| Doors | - Check doors are securely locked | ☐A ☐U | |
| Gates | - Check that gates are closed and locked at end of working day | ☐A ☐U | |
| Communication Equipment | | | |
| Telephones | - Check accessibility | ☐A ☐U | |
| Pull Stations | - Check accessability | ☐A ☐U | |
| Emergency Equipment | | | |
| Fire Extinguishers | - Ensure that access to units is not blocked | ☐A ☐U | |
| Eye Wash/Showers | -Ensure access is not blocked | ☐A ☐U | |
| Exits | -Ensure access is not blocked | ☐A ☐U | |

I certify that the above recommended action has been taken on items mentioned above and/or defective items are now satisfactory. Date: _____ Supervisor: _____

Figure 12 - Weekly Inspection Schedule

**Rinchem Quarterly Inspection Sheet**

Inspector's name _____ Date of Inspection _____

| ITEM | TYPES OF PROBLEMS | STATUS ACCEPTABLE (A) OR UNACCEPTABLE (U) | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION |
|---|---|---|---|
| Container Loading/ Unloading Area | - Check dock leveler for proper adjustment, operation, and corrosion | ☐A ☐U | |
| Storage Container Area | - Check for condition and availability of overpack and DOT 17H containers | ☐A ☐U | |
| Security Equipment | | | |
| Gates | - Check for damage or corrosion | ☐A ☐U | |
| Facility Fence | - Check for corrosion | ☐A ☐U | |
| | - Check fence for broken areas | ☐A ☐U | |
| Signs | - Check that signs are present (Spanish and English) | ☐A ☐U | |
| | - Check that they are legible (not damaged, readable at 25 feet) | ☐A ☐U | |
| Lighting | - Check to see all lights work (no defective bulbs or bad connections) | ☐A ☐U | |
| Safety Equipment | | | |
| Emergency Shower/ Eyewash | - Check water pressure | ☐A ☐U | |
| | - Check for leaks | ☐A ☐U | |
| Face Shields | - Check if broken or dirty | ☐A ☐U | |
| | - Adequate number of face shields | ☐A ☐U | |
| Protective glasses | - Check if broken | ☐A ☐U | |
| | - Adequate number of protective glasses for employees & visitors | ☐A ☐U | |
| First Aid Equipment and Kit | - Check that all necessary items are present | ☐A ☐U | |

Figure 13 - Quarterly Inspection Schedule

| ITEM | TYPES OF PROBLEMS | STATUS ACCEPTABLE (A) OR UNACCEPTABLE (U) | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION |
|---|---|---|---|
| Protective Clothing | - Check clothes for holes, wear and tear | ☐A ☐U | |
| | - Adequate number of sets of protective clothing | ☐A ☐U | |
| Chemical Respirator | - Adequate number of cartridges for respirators | ☐A ☐U | |
| | - Adequate number of respirators | ☐A ☐U | |
| Emergency Equipment | | | |
| Fire Extinguishers | - Check pressure guage for full charge indication | ☐A ☐U | |
| | - Check inspection tag to ensure annual maintainence by outside fire service is up-to-date | ☐A ☐U | |
| | - Check seal to ensure no one has used extinguisher | ☐A ☐U | |
| Emergency Lights | - Check for operation | ☐A ☐U | |
| Absorbents | - Check for accessability | ☐A ☐U | |
| | - Check for adequate supply | ☐A ☐U | |
| Self-Contained Breathing Apparatus | - Check if tanks are charged | ☐A ☐U | |
| | - Check if spare tanks are present | ☐A ☐U | |
| | - Check to see of spare tanks are charged | ☐A ☐U | |
| SPILPAC | - Check if all necessary items are present | ☐A ☐U | |
| Leak Detection System | - Check if tanks are sound | ☐A ☐U | |
| | - Check if tanks are empty | ☐A ☐U | |

I certify that the above recommended action has been taken on items mentioned above and/or defective items are now satisfactory. Date: _____ Supervisor: _____

Figure 13 - Quarterly Inspection Schedule (cont.)

**Rinchem Semiannual Inspection Sheet**

Inspector's name _____ Date of Inspection _____

| ITEM | TYPES OF PROBLEMS | STATUS ACCEPTABLE (A) OR UNACCEPTABLE (U) | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION |
|---|---|---|---|
| Forklift | - Complete safety checkup | ☐A ☐U | |
| Ground Monitoring System | - Sample and analyze the ground water for the following data: total dissolved solids, pH, and total organic carbon | ☐A ☐U | |

I certify that the above recommended action has been taken on items mentioned above and defective items are now satisfactory. Date: _____ Supervisor: _____

Figure 14 - Semiannual Inspection Schedule

# IV

# Waste Analysis

## IV. Waste Analysis

A. Chemical and Physical Analysis

[N. M. - 302.A.4.b.(1)(b), Federal - 270.14(b)(2) and 264.13(a)]

Rinchem Company, Inc. requires all generators who wish to store waste at this facility to provide data defining the chemical and physical characteristics of the generator's waste stream before the waste stream is transported. A more detailed explanation of the procedures used at the Rinchem Company Inc. facility to insure that all the analysis information necessary to store incoming waste streams is given in the Waste Analysis Plan (page WAP-2). The Waste Analysis Plan can be found in Appendix A.

In accordance with the Waste Analysis Plan, physical and chemical characterizations of each waste accepted at the Facility are maintained in office files at the facility.

Table 1 summarizes the wastes and waste constituents that will be stored at the Rinchem Company facility. The following information is summarized in this table:

(1) EPA hazardous waste number

(2) Common name of the waste or waste type

(3) EPA hazard characteristics (i.e. corrosivity, toxicity, ignitability, reactivity, or EP toxicity)

Other wastes that could be expected to be stored are mixtures of the wastes shown in Table 1. The EPA hazard characteristics for these

mixtures would be a combination of the hazard characteristics of the individual constituents.

**Table 1. Wastes Anticipated to be Stored at the Facility**

| EPA Hazardous Waste Number | Common Name of Waste or Waste Type | EPA Hazard Characteristic |
|---|---|---|
| F001 | Spent Halogenated Solvents Used in Degreasing: | Toxic |
| F001 | Tetrachloroethylene | Toxic |
| F001 | Trichloroethylene | Toxic |
| F001 | Methylene Chloride | Toxic |
| F001 | 1,1,1-Trichloroethane | Toxic |
| F001 | Carbon Tetrachloride | Toxic |
| F001 | Chlorinated Fluorocarbons | Toxic |
| F002 | Spent Halogenated Solvents: | Toxic |
| F002 | Tetrachloroethylene | Toxic |
| F002 | Trichloroethylene | Toxic |
| F002 | Methylene Chloride | Toxic |
| F002 | 1,1,1-Trichloroethane | Toxic |
| F002 | Chlorobenzene | Toxic |
| F002 | 1,1,2-Trichloro-1,2,2-Trifluoro-ethane | Toxic |
| F002 | O-Dichlorobenzene | Toxic |
| F002 | Trichlorofluoromethane | Toxic |

## Table 1. Wastes Anticipated to be Stored at the Facility

(cont.)

| EPA Hazardous Waste Number | Common Name of Waste or Waste Type | EPA Hazard Characteristic |
|---|---|---|
| F003 | Spent Non-Halogenated Solvents: | Ignitable |
| F003 | Xylene | Ignitable |
| F003 | Acetone | Ignitable |
| F003 | Ethyl Acetate | Ignitable |
| F003 | Ethyl Benzene | Ignitable |
| F003 | Ethyl Ether | Ignitable |
| F003 | n-Butyl Alcohol | Ignitable |
| F003 | Cyclohexanone | Ignitable |
| F003 | Methyl Isobutyl Ketone | Ignitable |
| F003 | Methanol | Ignitable |
| F004 | Spent Non-Halogenated Solvents: | Toxic |
| F004 | Cresols | Toxic |
| F004 | Cresylic Acid | Toxic |
| F004 | Nitrobenzene | Toxic |
| F005 | Spent Non-Halogenated Solvents: | Toxic, Ignitable |
| F005 | Toluene | Toxic, Ignitable |
| F005 | Methyl Ethyl Ketone | Toxic, Ignitable |
| F005 | Carbon Disulfide | Toxic, Ignitable |
| F005 | Isobutanol | Toxic, Ignitable |
| F005 | Pyridine | Toxic, Ignitable |

## Table 1. Wastes Anticipated to be Stored at the Facility

(cont.)

| EPA Hazardous Waste Number | Common Name of Waste or Waste Type | EPA Hazard Characteristic |
|---|---|---|
| | Acute Hazardous Waste: | |
| P005 | Allyl Alcohol | Acute Hazardous |
| P022 | Carbon Disulfide | Acute Hazardous |
| | Toxic Wastes: | |
| U001 | Acetaldehyde | Ignitable |
| U002 | Acetone | Ignitable |
| U003 | Acetonitrile | Ignitable, Toxic |
| U008 | Acrylic Acid | Ignitable |
| U012 | Aniline | Ignitable, Toxic |
| U019 | Benzene | Ignitable, Toxic |
| U031 | n-Butyl Alcohol | Ignitable |
| U211 | Carbon Tetrachloride | Toxic |
| U037 | Chlorobenzene | Toxic |
| U044 | Chloroform | Toxic |
| U051 | Creosote | Toxic |
| U052 | Cresols | Toxic |
| U057 | Cyclohexanone | Ignitable |
| U069 | Dibutyl Phthalate | Toxic |
| U070 | o-Dichlorobenzene | Toxic |
| U071 | m-Dichlorobenzene | Toxic |
| U072 | p-Dichlorobenzene | Toxic |

## Table 1. Wastes Anticipated to be Stored at the Facility

(cont.)

| EPA Hazardous Waste Number | Common Name of Waste or Waste Type | EPA Hazard Characteristic |
|---|---|---|
| U025 | Dichloroethyl Ether | Toxic |
| U088 | Diethyl Phthalate | Toxic |
| U092 | Dimethylamine | Ignitable |
| U102 | Dimethyl Phthalate | Toxic |
| U107 | Di-n-Octyl Phthalate | Toxic |
| U112 | Ethyl Acetate | Ignitable |
| U113 | Ethyl Acrylate | Ignitable |
| U117 | Ethyl Ether | Ignitable |
| U118 | Ethylmethacrylate | Toxic |
| U124 | Furan | Ignitable |
| U125 | Furfural | Ignitable |
| U127 | Hexachlorobenzene | Toxic |
| U140 | Isobutyl Alcohol | Ignitable,Toxic |
| U154 | Methyl Alcohol | Ignitable,Toxic |
| U080 | Methylene Chloride | Toxic |
| U159 | Methyl Ethyl Ketone | Ignitable, Toxic |
| U161 | Methyl Isobutyl Ketone | Ignitable |
| U162 | Methyl Methacrylate | Ignitable, Toxic |
| U165 | Naphthalene | Toxic |
| U169 | Nitrobenzene | Ignitable, Toxic |
| U171 | 2-Nitropropane | Ignitable |
| U188 | Phenol | Toxic |

**Table 1. Wastes Anticipated to be Stored at the Facility**

(cont.)

| EPA Hazardous Waste Number | Common Name of Waste or Waste Type | EPA Hazard Characteristic |
|---|---|---|
| U191 | 2-Picoline | Toxic |
| U196 | Pyridine | Toxic |
| U210 | Tetrachloroethylene | Toxic |
| U213 | Tetrahydrofuran | Ignitable |
| U220 | Toluene | Toxic, Ignitable |
| U226 | 1,1,1-Trichloroethane | Toxic |
| U227 | 1,1,2-Trichloroethane | Toxic |
| U228 | Trichloroethylene | Toxic |
| U121 | Trichloromonofluoromethane | Toxic |
| U239 | Xylene | Ignitable |

Another group of wastes that could be received at this facility are not listed wastes, but do exhibit the hazard characteristic of ignitability. The basis for hazardous designation is a flashpoint of 140 °F or less. The EPA ID number for these compounds is D001. The spent solvents can be received as individual chemicals or mixtures thereof. Examples of such wastes are shown in Table 2 (following page).

## Table 2. Examples of Wastes with EPA Hazardous Waste Number D001

| Chemical | Flashpoint (°F) |
|---|---|
| Amyl Acetate | 77 |
| p-Amyl Acetate | 77 |
| Butyl Acetate | 72 |
| s-Butyl Alcohol | 75 |
| t-Butyl Alcohol | 52 |
| Cellosolve Acetate | 117 |
| Diisobutyl Ketone | 120 |
| Ethyl Alcohol | 55 |
| Ethyl Cellosolve | 80 |
| Heptane | 25 |
| Hexane | -7 |
| Lactol Spirits | 20 |
| Methyl Acetate | 14 |
| Methyl Amyl Ketone | 120 |
| Methyl Cellosolve | 115 |
| Petroleum Naphtha | 105 |
| Propyl Acetone | 58 |
| Isopropyl Acetate | 40 |
| Propyl Alcohol | 77 |
| Isopropyl Alcohol | 53 |
| VMP&P Naphtha | 40 |

# 五

# Training

## V. Training [N.M.-302.A.4.b.(1)(1), U.S.-270.14(b)(12) and 264.16]

A. General

The requirements of the E.P.A. in compliance with RCRA has resulted in the need for a specific training program which qualifies the employees as able to perform their duties in keeping with the regulations. This section includes descriptions of the jobs that the employees will be trained for as well as an outline of the actual training program by Rinchem Company, Inc.

The training program outlined in this section will be used as an introductory training program as well as an annual review training program. New employees filling a position at the facility and who will be involved in hazardous waste management and/or handling activities shall be trained in all necessary facets of hazardous waste management within six months after their employment or assignment to the facility.

B. Job Descriptions

A basic ingredient in an employee's ability to be trained properly for a job handling hazardous waste is his ability to realize his responsibilities in his position. The following job descriptions which include the handling of hazardous waste are included in this training section as an integral part of the training program.

## V. Training [N.M.-302.A.4.b.(1)(l), U.S.-270.14(b)(12) and 264.16]

A. General

The requirements of the E.P.A. in compliance with RCRA has resulted in the need for a specific training program which qualifies the employees as able to perform their duties in keeping with the regulations. This section includes descriptions of the jobs that the employees will be trained for as well as an outline of the actual training program by Rinchem Company, Inc.

The training program outlined in this section will be used as an introductory training program as well as an annual review training program. New employees filling a position at the facility and who will be involved in hazardous waste management and/or handling activities shall be trained in all necessary facets of hazardous waste management within six months after their employment or assignment to the facility.

B. Job Descriptions

Replaced by 2/17/87

A basic ingredient in an employee's ability to be trained properly for a job handling hazardous waste is his ability to realize his responsibilities in his position. The following job descriptions which include the handling of hazardous waste are included in this training section as an integral part of the training program.

B.1 PRESIDENT

I. Qualifications

1. Education: *4 year degree from accredited college or university
2. Experience *10 year minimum

II. Requirements:

1. Must complete company training program
2. Knowledge of Waste Analysis Plan
3. Knowledge of Waste Management Procedure
4. Knowledge of products including safety data sheets
5. Knowledge of company's policy and procedures
6. Knowledge of accounting procedures
7. Familiarization with E.P.A., D.O.T. and other regulations
8. Knowledge of Emergency Contingency Plans
9. Attend outside training workshop and seminars to keep employees and customers informed

III. Duties:

1. Oversees safety program for work force and customers
2. Oversees Emergency Response Plans
3. All company policy
4. All approval of company rules and regulations
5. Oversees training programs for all employees
6. Oversees general operations of the company

III. Duties (cont.)

7. Oversees all capital expenditures
8. Marketing policies
9. Financing policies
10. Budget considerations
11. Employee relations
12. Oversees:
    a. Laboratory
    b. Maintenance
    c. Warehousing
    d. Transportation
    e. Sales
    f. Engineering
13. Community participation and involvement
14. Compliance with all government regulations

* Qualifications may be waived at the option of Management if in their judgement there exists equivalents to the stated requirements.

B.2 Hazardous Waste Management Coordinator

Qualifications:

1. Education: *4 year degree from accredited college or university
2. Experience *3 year minimum

II. Requirements:

1. Must complete company training program
2. Knowledge of Emergency Contingency Plan
3. Knowledge of Waste Analysis Plan.
4. Knowledge of Waste Management Procedure
5. Must be familiar with Material Safety Data sheets
6. Familiarization with E.P.A., D.O.T. and other regulations

III. Duties

1. Train personnel in company training program with respect to hazardous waste management and handling
2. Will be the Chief Emergency Coordinator
3. Responsible for the management of hazardous waste including analysis, sampling, storage, and handling
4. Assures that necessary reports, records, notifications, etc., are prepared to comply with RCRA, as well as all other government regulations. This includes routine activities as well as non-routine occurences, such as the implementation of the Contingency Plan.
5. Reports to the Rinchem Company President

B.3 Customer Service Supervisor

Qualifications:

| | | |
|---|---|---|
| 1. | Education | High School graduate |
| 2. | Experience | *1-2 years of experience or training in transportation and warehousing activities. Supervisory experience desirable. |

Requirements:

1. Knowledge of Emergency Contingency Plan
2. Knowledge of all products including Material Safety Data sheets
3. Knowledge of all regulations pertaining to the operation of equipment in the plant
4. Knowledge of E.P.A. and D.O.T. and other regulations

Duties:

1. Maintains operational logs, maintenance records, and inspection records
2. Supervises loading/unloading of all materials, placement of materials, and required paperwork as required by Company procedures
3. Involved in the training and indoctrination of new personnel at the branch facility
4. Schedules all maintenance and repair of equipment and facility structure of both a routine and non-routine nature

III. Duties (cont.)

5. Oversees the drivers' activities to assure compliance with all appropriate procedures for transporting of materials, accepting waste materials, response to emergency situations, and equipment maintenance.
6. Conducts inspections of the facility, waste container, and emergency equipment and implements any necessary remedial activities if inspection reports warrant.
7. Functions as Emergency Coordinator in the absence of the Rinchem Company President or the Hazardous Waste Management Coordinator.
8. Reports to the Rinchem Company President

B.4 Truckdriver/Warehouseman

I. Qualifications

| | | |
|---|---|---|
| 1. | Education | High School Education |
| 2. | Experience | *Two years minimum in the type of equipment to be used |

II. Requirements

1. Knowledge of Emergency Contingency Plan
2. Familiar with material safety data sheets for all products
3. Familiar with E.P.A., D.O.T. and other regulations
4. Knowledge in operation of fork lift
5. Familiarization of safety and transportation of all types of products shipped by the company
6. Class 8 Drivers License with excellent driving record.

III. Duties

1. Responsible for correctly picking up hazardous wastes from customers.
2. Responsible for delivery of hazardous materials.
3. Assist customer in anyway to insure safety and compliance with all regulations
4. Load and unload trucks
5. Responsible for safety and maintenance of equipment in warehouse area
6. Insure that all D.O.T. regulations are complied with

III. Duties (cont.)

7. Sample incoming hazardous waste shipments for use in fingerprint analysis.
8. Completes Pre-Acceptance Inspection Sheet
9. Store incoming drums in proper area
10. Complete facility inspections as assigned.

Figure 15 shows the line of authority at the Rinchem Company, Inc. facility as well as the present men in these positions.

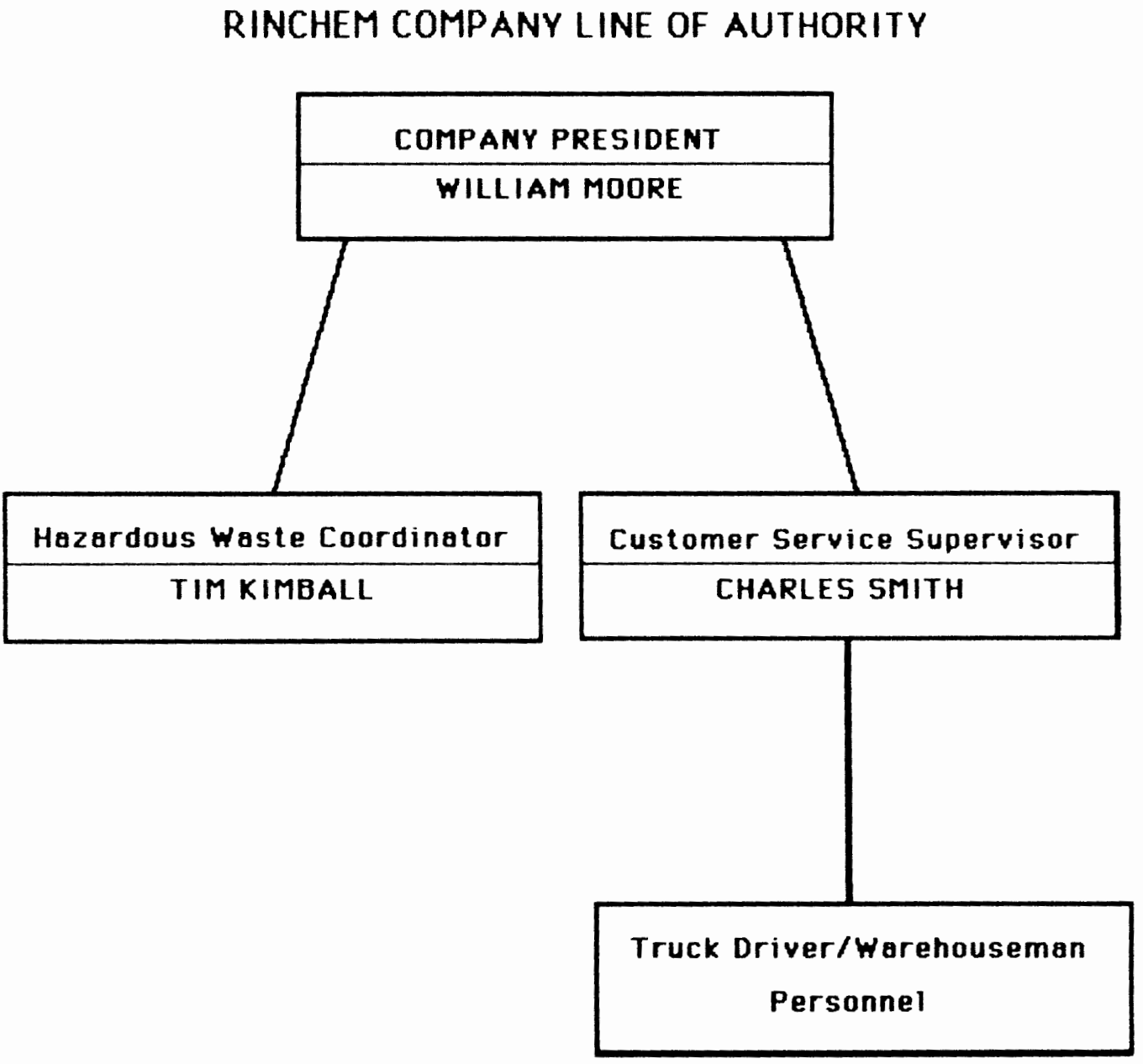


Figure 15. Rinchem Company Line of Authority

C. Introductory Training Program

In order to teach the facility personnel as required under RCRA, Rinchem has developed a series of lessons which will be taught by one or more qualified instructors. Each lesson will be taught as a 1 hour classroom session. In addition to the classroom sessions, each employee will be a probationary employee working under close supervision during the first 90 days of employment. During this period he will be receiving on-the-job training which will include every RCRA related procedure which is relevant to his duties. At the completion if each training session and/or at the completion of the introductory training program, each trainee must successfully pass an examination which is designed to indicate a reasonable understanding and capability of performing his/her duties in keeping with the requirements found in the regulations.

Training records will be kept for each person throughout his/her employment and for three years after termination. These records will include the examinations that will be taken during the introductory training program.

Each new employee of Rinchem Company Inc. will be given at date of employment the following training aids and information:

(1) A copy of the Emergency Contingency Plan

(2) Each employee will receive information relating to working hours, sick pay, vacation schedule, etc.

(3) Shipping and receiving employees will receive labeling and

placarding guides with E.P.A. and D.O.T. regulations for shipping and receiving hazardous waste.

(4) Drivers will receive booklets in CFR-49 (regarding driver responsibility), Motor Transit Bureau booklets, plus manifesting guide and various related information.

Each new employee will be expected to familiarize him/herself with the information (as listed) for a better understanding of forth-coming classroom instruction.

Each new employee is issued all necessary safety gear, safety glasses, chemical gloves, etc. He is also taken on a plant tour showing him/her the location all emergency equipment, first aid station, emergency showers, fire prevention equipment, alarm systems, and the emergency telephone lists which are posted conspicuously by each phone.

The training program is divided into twelve sessions. Each session lasts about approximately 1 hour. The classroom instruction lasts about 30 minutes. A 15 minute question and answer session is followed by 15 minutes that is allocated to take a test over the materials discussed in that training session. Outlines to briefly describe the type of material that is covered in the individual training sessions is appended as pages TP1 through TP41. These outlines will be modified with time to stay current and with experience to keep human health and the environment as the ultimate priority.

D. Annual Training Program

Review of the introductory training program is done on a monthly basis. Rinchem company policy requires monthly training and safety sessions at its facility. These monthly meetings review one of the twelve sessions of the introductory training program in each monthly meeting. In addition, other safety concerns are also discussed. Attendance to this meeting is mandatory for all employees that are in any way involved with the handling of hazardous waste. The classroom instruction review lasts about 1/2 hour. A 30 minute discussion period follows. The classroom outlines which briefly describe the material that is covered in the individual training review sessions have already been discussed.

E. Specific Training Programs

Because of the size of the Rinchem facility at this time, all waste handlers and their supervisors will be given the same training program. All employees involved with handling hazardous waste are either doing all the duties involved with the handling of the hazardous waste or are in a supervisory position over the employees who handle the hazardous waste. For this reason, all of these employees need to complete the entire training program in order to know all the information needed to handle hazardous waste. Specific training programs will be implemented for different jobs when the need arises.

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F. Training Instructor

The training instruction will be divided between the Hazardous Waste Management Coordinator, and the Customer Service Supervisor. Qualifications for the Waste Management Coordinator can be found in Section B.2 (page 66) and for the Customer Service Supervisor in Section B.3 (page 67). Documentation which demonstrates that these qualifications are met will be maintained in the respective personnel files of the individuals in these positions.

The hazardous waste management coordinator has a working knowledge of all the characteristics and hazards of the different waste streams, of governmental regulations regarding the handling of hazardous waste, and of the Rinchem Waste Analysis Plan and the sampling and laboratory techniques that are used in this plan.

The customer service coordinator is the actual person in charge of the physical handling of the hazardous waste, and is responsible for the safety and inspection of the Rinchem Facility.

These two individuals serve as instructors for the training program in the areas of their respective expertise.

F. Training Instructor

The training instruction will be divided between the hazardous waste management coordinator and the customer service supervisor. The hazardous waste management coordinator has a working knowledge of all the charateristics and hazards of the different waste streams, of the governmental regulations regarding the handling of hazardous waste, and of the Rinchem Waste Analysis Plan and the sampling and laboratory techniques that are used in this plan. The customer service coordinator is the actual person in charge of the physical handling of the hazardous waste, and is responsible for the safety and inspection of the Rinchem facility. These two people instruct the training program when it discusses their respective expertise. Between the two, the training program has the best instructor available.

Replaced by 2/17/87

# VI

# Contingency

## VI. Contingency Plan

**[N.M. - 302.A.4.b.(1)(g), Fed - 270.14(b)(7) & Part 264 Subpart D]**

A. Introduction

Pursuant to RCRA requirements, Rinchem facility will maintain a Contingency Plan on-site that details procedures to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden release of hazardous wastes or hazardous wastes constituents to air, soil, or surface water. The Plan provides explicit descriptions of the response procedures to be implemented in an emegency situation, which are intended to protect the public, personnel at the facility, and the environment.

Because Rinchem is a chemical warehouse for technical and semiconductor grade solvents, corrosives and oxidizers are also stored at the facility. The Contingency Plan covers emergencies involving these as well as the storage of hazardous waste streams of organic solvents and oils.

B. Criteria for Implementation [Federal - 264.51 & 264.52(a)]

The Contingency Plan will be implemented for any of the following situations: (1) fire and or explosion, (2) spill or material release, (3) bomb threat, and (4) severe storms or floods. Detailed descriptions of the implementation procedure is described in the Contingency Plan (pages CP-3 through CP-4).

C. Contingency Plan Arrangements [Federal - 264.52(c)]

The Contingency Plan describes arrangements agreed to by local police departments, fire departments, hospitals, and state and local emergency response teams to coordinate emergency services. This information can be found on page 23 in the Contingency Plan.

D. Emergency Coordinators Identification [Federal - 264.53(d)]

Rinchem has identified an Emergency Coordinator who will take charge in an emergency. The Emergency Coordinator is responsible for the safety of the personnel at the Rinchem facility. The Emergency Coordinator has the authority necessary to make any important decisions in an emergency. The names, addresses, and home/work phones of the primary and alternate emergency coordinators are shown in the Contingency Plan (page CP-5). In addition, the authority and qualifications of the Emergency Coordinator are also discussed in the Contingency Plan (page CP-6).

E. Emergency Equipment List [Federal - 264.52(e)]

Rinchem has all the necessary equipment that would be needed in the event of an emergency. A list of the equipment is included in the Contingency Plan as well as the location and description of each piece of equipment (pages CPA-1 through CPA-5).

C. Contingency Plan Arrangements [Federal - 264.52(c)]

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Replace by 2/17/87

Rinchem has all the necessary equipment that would be needed in the event of an emergency. A list of the equipment is included in the Contingency Plan as well as the location and description of each piece of equipment (pages CPA-1 through CPA-5).

F. Evacuation Plan [Federal - 264.52(f)]

Rinchem has an evacuation plan in the case of an emergency. The criteria for implementation of the evacuation plan as well as primary and alternate routes for evacuation are found in the Contingency Plan (pages CP-15 through CP-17).

G. Contingency Plan Copy Location [Federal - 264.53]

A copy of the Rinchem Contingency Plan can be found at the facility as well as with the appropriate local authorities. A description of the locations of the different Rinchem Contingency Plan Copies is discussed in the Contingency Plan (page CP-23).

H. Contingency Plan Amendment [Federal - 264.54]

The Contingency Plan is amended when necessary. A description of the procedure used to change the Contingency Plan as well as the person responsible to amend the plan is discussed in the Contingency Plan (page CP-24).

I. Detailed Emergency Procedures [Federal - 270.14(b)(7) & 264.56]

As was mentioned, the main purpose of the Rinchem Contingency Plan is to ensure that all the necessary procedures to control an emergency situation are known to all employees of the facility. This includes specific responses and control procedures for

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Replaced by 2/17/87

As was mentioned, the main purpose of the Rinchem Contingency Plan is to ensure that all the necessary procedures to control an emergency situation are known to all employees of the facility. This includes specific responses and control procedures for

fire and/or explosion (pages CP-7 through CP-9), spill (pages CP-9 through CP-10), accident in transit (page CP-11 through CP-12), bomb threat (page CP-12 through CP-14), and flood or severe storm (page CP-14). Other procedures such as state and federal notification is also discussed in the Contingency Plan (page CP-23).

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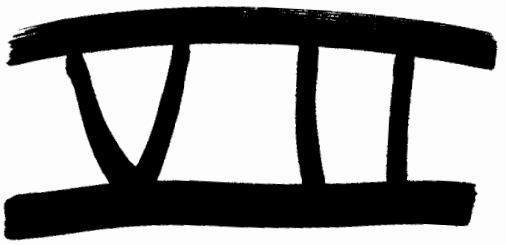
Replaced by 2/17/87



# Closure Requirements

## VII. Closure Requirements

### [N.M. - 302.A.4.b.(1)(m-q), Federal - 270.14(b)(13) & 264.112-118]

A. Introduction

This section addresses the RCRA closure and financial assurance requirements as they pertain to Rinchem Company Inc. Upon initiation of the closure period, stored wastes will be removed and transported to a fully permitted T.S.D. facility.

B. Closure Plan [N.M. - 304.A.4.b(1)(m), Federal - 264.112]

This closure plan identifies the steps necessary to close the Rinchem facility at any point during its operation or at the end of its projected life. An independant bound copy of this Closure Plan will be kept on file at the facility. The plan will be updated as necessary, to ensure adequate site closure.

The facility's Hazardous Waste Management Coordinator is responsible for the maintenance of the facility's copy of the Closure Plan.

B.1 Partial and Post-Closure Plans
[Federal -270.14(b)(13), 264.117 & 264.118]

This facility, as it pertains to hazardous waste management

B.3 Equipment Decontamination Procedure [Federal - 264.114]

Because this facility is designed for storage as opposed to disposal, decontamination activities would be minimal. None of the equipment utilized at this facility would be required to be disposed of due to its utilization in waste management. Since Rinchem policy would have required all traces of contamination resulting from a leakage or spill of hazardous waste to have been cleaned up at the time of the incident, no such cleanup or decontamination is expected to be required at the time of closure. If for the sake of extra certainty, some material was discarded, it would be considered as a hazardous waste in its own right.

At the time of closure, each bay will be scrubbed using a drum of water. The rinsate from this cleaning procedure will be collected in a drum suitable for shipment of hazardous wastes to a disposal site, if necessary. A sample will be collected from each drum of rinsate in accordance with procedures outlined in WAP pages 8 thru 11. They will be analyzed in accordance with test methods described in ASTM 505 for TOC In the event the total organic carbon content is in excess of 50 mg/l. the specific bay will be recleaned until TOC levels are <50 mg/l..

B.4 Final Closure Procedures

In the event that Rinchem decided to close this site as a hazardous waste storage facility, the required 180-day notice period required by the EPA would be given. If the closure of this facility

B.3 Equipment Decontamination Procedure [Federal - 264.114]

Because this facility is designed for storage as opposed to disposal, decontamination activities would be minimal. None of the equipment utilized at this facility would be required to be disposed of due to its utilization in waste management. Since Rinchem policy would have required all traces of contamination resulting from a leakage or spill of hazardous waste to have been cleaned up at the time of the incident, no such cleanup or decontamination is expected to be required at the time of closure. If for the sake of extra certainty, some material was discarded, it would be considered as a hazardous waste in its own right.

As a final precaution, at closure the drum storage, handling areas and equipment will be scrubbed. The rinsate will be collected, containerized, and transported to a permitted hazardous waste T.S.D. facility.

After cleanup of potentially contaminated areas (if any), the areas will be analyzed for waste constituents (solvents) to determine the effectiveness of the decontamination program.

B.4 Final Closure Procedures

Replaced by 2/17/87

In the event that Rinchem decided to close this site as a hazardous waste storage facility, the required 180-day notice period required by the EPA would be given. If the closure of this facility

were to be undertaken, notices would be sent to present generators employing Rinchem's services to inform them of the pending discontinuation of receiving their waste materials. All materials would be removed from the site within 90 days of receipt of the final volume of waste and the total closure activities will be completed within 180 days.

All inventory in storage would be expected to be already accepted at a permitted T.S.D. facility. Prior to loading, all drums would be inspected for leakage, damage, and proper labelling. Proper manifest forms will be completed for the movement.

B.4.1 Closure Schedule [Federal - 264.113 & 270.14(b)(13)]

The following schedule is proposed for final closure of the Rinchem Company, Inc. facility:

| Activity | Cumulative Day Completed |
|---|---|
| Remove all remaining wastes to approved hazardous waste treatment and/or disposal facility | Day 90 |
| Flush all waste storage areas, and spill containment systems with water; collect contaminated water, and draw samples for analysis; complete appropriate soil sampling program | Day 120 |

were to be undertaken, notices would be sent to present generators employing Rinchem's services to inform them of the pending discontinuation of receiving their waste materials. All materials would be removed from the site within 60 days of receipt of the final volume of waste and the total closure activities wil be completed with 180 days as required as a maximum.

Once formal approval of the planned closure procedures are received from the Agency, the anticipated total time required to schedule trucks into the facility, to load up all drummed material, and clean (if required) the containment area is a maximum of 60 days. All inventory in storage would be expected to be already accepted at a permitted T.S.D. facility. Minimal pretreatment would be required before material was ready for shipment. Prior to loading, all drums would be inspected for leakage, damage, and proper labelling. Proper manifest forms will be completed for the movement.

B.4.1 Closure Schedule [Federal - 264.113 & 270.14(b)(13)]

The following schedule is perferred for final closure of the Rinchem Company, Inc. facility:

Replaced by 2/17/87

| Activity | Cumulative Day Completed |
|---|---|
| Receive final shipment of hazardous wastes | Day 90 |

| | |
|---|---|
| Collect and dispose of contaminated wash water, any contaminated site soil, and/or cleaning materials | Day 150 |
| Inspect and certify closure | Day 170 |
| Site closure complete | Day 180 |

B.4.2 Expected Closure Date

Rinchem will continue to operate a business at this facility as long as it is deemed economically viable, and so long as its operation is otherwise permitted by applicable law. An "anticipated" date of closure can be postulated as the year 1998 .

C. Closure Cost Estimate

[N.M.- 302.A.4.b.(1)(o), Federal - 270.15(b)(15) & 264.142]

The closure cost for the Rinchem facility is predicted on the estimated point in time at which closure would be most expensive, as required by federal reguations. For this facilty, that point translates to a situation during which the waste storage area is filled to its design/permitted capacity.

The following estimates are presented in 1986 dollars and are based on maximum utilization of storage capacity at the time of closure.

| | |
|---|---|
| Remove all remaining wastes to approved hazardous waste treatment and/or disposal facility | Day 150 |
| Flush all wastes storage areas, and spill containment systems with water; collect contaminated water, and remove to T.S.D.; complete appropriate soil sampling program | Day 160 |
| Collect and dispose of wash water, any contaminated site soil, and/or cleaning solutions | Day 160 |
| Inspect and certify closure | Day 170 |
| Site closure complete | Day 180 |

B.4.2 Expected Closure Date

Rinchem will continue to operate a business at this facility as long as it is deemed economically viable, and so long as its operation is otherwise permitted by applicable law. An "anticipated" date of closure can be postulated as the year 1998 .

Replaced by 2/17/89

C.1 Summary of Closure Costs

| | |
|---|---|
| (1) Transport 500 drums to T.S.D. facility (average costs $60/drum) | $ 30,000 |
| (2) Decontaminate drum storage areas | $ 1,000 |
| (3) Collect and dispose of wash water from drum storage area decontamination | $ 2,000 |
| (4) Analytical chemical sampling and analysis program | $ 2,000 |
| (5) Soil sampling and analysis plan | $ 2,000 |
| (6) Certification by Professional Engineer | $ 3,000 |
| (7) Contingency for removal of soil or equipment or part of structure | $ 10,000 |
| Total Estimated Closure Cost (1986 dollars) | $ 50,000 |

D. Documentation of a Financial Assurance Mechanism [Federal-264.143 & 264.146]

D.1 Closure Trust Fund [Federal - 264.151(a)]

This section attests that Rinchem will utilize a trust fund to satisfy the §264.143 financial assurance requirements for the Rinchem Company, Inc. Rinchem will put $ 5000 each year into the trust fund for a period of 10 years. Prior to a final permit decision, if requested, the amount of money in the Rinchem trust fund will be submitted to the appropriate authorities. The trust fund will be adequate to cover the amount of money that would be needed in a unexpected closure.

C. Closure Cost Estimate

[N.M.- 302.A.4.b.(1)(o), Federal - 270.15(b)(15) & 264.142]

The closure cost for the Rinchem facility is predicted on the estimated point in time at which closure would be most expensive, as required by federal reguations. For this facilty, that point translates to a situation during which the waste storage area is filled to its design/permitted capacity.

The following estimates are presented in 1986 dollars and are based on maximum utilization of storage capacity at the time of closure.

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| Total Estimated Closure Cost (1986 dollars) | $ 50,000 |

Replaced by 2/17/87

E. Coverage by an Equivalent State Financial Mechanism

[Federal - 270.14(b)(18), 264.149, and 264.150]

These provisions are not applicable to the Rinchem Company, Inc. facility. Rinchem does not anticipate any State assumption of legal or financial responsibilities for the closure or liability requirements at this time.

F. Insurance Coverage [to satisfy requirements of HWMR-3, 302.A.4.b.(1).(g).]

Rinchem Company Inc. will deliver to the Director of the New Mexico Environmental Improvement Division either a signed duplicate original of the Hazardous Waste Facility Liability Endorsement or the Certificate of Liability Insurance at least 60 days prior to the date on which hazardous waste is first received for storage under this permit. This insurance will be in effect before the initial reciept of hazardous waste.

G. Corrective Action for SWMU's [Federal 264.101]

The drum storage areas, and the spill collection tank are the only SWMU's at the facility. Ground water testing, physical inspections, employee training, and employee reporting of incidents have been required since the initial construction of the facility. No releases of hazardous waste, or their constituents to the environment are known or believed to have occurred. As such, schedules for corrective action as required in 40 CFR Part 264.101, are not applicable to this permit.

D. Documentation of a Financial Assurance Mechanism

[Federal-264.143 & 264.146]

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Replaced by 2/17/87

# VIII

# Containers

## VIII. Container Management Practices
## [N.M.-302.A.4.(2)(a), Federal-270.15]

A. Compatability of Waste with Containers

The containers handled by Rinchem are usually drums with a 55 gallon capacity. Containers typically utilized are constructed of steel, meeting DOT specification 17E. DOT specification 17H (openhead) and 85 gallon overpack drums may occasionally be encountered as well. The customer is required to provide the spent material in a container authorized for the commodity as set forth by the Department of Transportation in 49 CFR 172.101.

Reuse of containers for waste materials by customers is allowed as authorized by the D.O.T. Rinchem does request of its customers that if they are reusing containers, they place spent materials back into a container which held the same virgin material. This practice is encouraged to ensure that there is no risk of incompatible materials being introduced into the container which might result in container failure, or cause crosscontamination which may result in container failure. DOT regulations require that generators refilling used containers allow them to stand for 24 hours before shipment to preclude transportation of leakers.

B. Condition of Containers

Contents of a container of waste would be transferred if a

leaking container were discovered. The material would be transferred to another container meeting appropriate container specifications in order to avoid further release of the material. A transfer of this type shall be accomplished as set forth in written procedures on hand at the facility, and under the direct supervision of the Emergency Coordinator.

C. Management of Containers

A container holding hazardous waste is always closed during storage, except when it is necessary to add or remove waste. A container holding hazardous waste is not opened, handled, or stored in any manner which may rupture the container or cause it to leak. Containers are not to be opened for sampling or repackaging in a storage area. They are to be transferred to the dock area to provide maximum ventilation.

D. Containment System

The secondary containment system that is used at the Rinchem facility is adequate for the amount of waste that will be stored at the Rinchem facility at any time. The waste will be stored in the southern half of the Rinchem warehouse. The floor of the warehouse is recessed four inches below the walls of the warehouse except for in the office. The southern half of the building is 50' X 136'. The floor is made up of concrete. Concrete is acknowledged to be resistant to all neutral organic solvents, both halogenated and

non-halogenated.

The floor in the southern half of the building is divided into six bays. Each bay is 17'x50' and is sloped to drains situated in the center of each bay. There is a 3% slope on the width of the bay, and a 1 % slope on the length of the bay. The drains lead to a 500 gallon cement tank behind the building. This tank is housed in another cement watertight tank which has a volume of 3,790 gallons. Both tanks have removable vented lids to allow for visual inspection. Any large spill will be contained on the shipping dock or in the cement tanks. In any either event, the capacity would be at least 50 drums. The spill will be easy to analyze and clean up using this containment system.

The facility was elevated five feet above the surrounding land when it was constructed. This prevents any problems with contamination of run-on water into the containment system. In addition, the containment system is inside the warehouse, preventing any rain from entering the storage area.

E. Inspections

All incoming shipments of drums are inspected by the drivers using a Pre-Acceptance Inspection Sheet that can be found in the Inspection section of this permit (page 51). This inspection sheet ensures that all drums which are accepted into the Rinchem facility meet all the E.P.A. and D.O.T. regulations. The waste storage area is inspected weekly to insure that no leaks occur at the facility. This

non-halogenated.

The floor in the southern half of the building is sloped to drains that lead to a 500 gallon cement tank behind the building. This tank is housed in another cement watertight tank which has a volume of 3,790 gallons. Both tanks have removable vented lids to allow for visual inspection. Any large spill will be contained on the shipping dock or in the cement tanks. In any either event, the capacity would be at least 50 drums. The spill will be easy to analyze and clean up using this containment system.

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Replaced by 2/17/87

inspection schedule is given in the Inspection section of this permit application (page 52).

F. Storage of Containers that do not Contain Free Liquids

No covered wastes that do not contain free liquids will be stored at this facility. The regulations that cover this item are not applicable to Rinchem.

G. Containers Containing Ignitable or Reactive Wastes

As required by Federal regulations, all ignitable and reactive wastes will be stored 50 feet away from Rinchem's property line. Rinchem stores all wastes at least 50 feet from its property line.

H. Incompatible Wastes

Aisles within the building provide access to storage areas. The aisle width is maintained at 120 inches. Aisle boundaries are clearly marked. Workmen are instructed to keep aisles clear of obstruction at all times. Drums of covered waste are generally stacked in rows that are two drums (4 feet) wide and not more than 12 drums (24 feet) long. Rows are separated by approximately 6" to 8" to provide easy access of fork lift trucks for drum movement and inspection. To enhance stability of the stack, pallets are not used. The drums are overlaped in the stacking, and are stacked no more than 3 high.

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G. Containers Containing Ignitable or Reactive Wastes

As required by Federal regulations, all ignitable and reactive wastes will be stored 50 feet away from Rinchem's property line. Rinchem stores all wastes at least 50 feet from its property line.

H. Incompatible Wastes

All storage containers holding hazardous waste that is incompatible with other materials stored at the warehouse will be separated and protected from these materials by a four-hour fire wall.

No incompatible wastes are ever placed in the same container unless the proper precautions are taken which are found in the N.M.H.W.M. regulations (206.B.7.b). In addition, no incompatible wastes are ever placed in an unwashed container unless the precautions already mentioned are followed (N.M.H.W.M.R. 206.B.7.b).

Replaced by 2/17/87

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# Appendix A

# Waste Analysis Plan

# APPENDIX A.

# WASTE ANALYSIS PLAN

# WASTE ANALYSIS PLAN
# RINCHEM COMPANY, INC.
# ALBUQUERQUE, NEW MEXICO

Submitted with Rinchem's

Part B RCRA Application

on

August 5, 1986

Revision 2/17/87

# WASTE ANALYSIS PLAN

## TABLE OF CONTENTS

**Waste Analysis Plan [N.M.- 302.A.4.b.(1)(c), U.S. - 270.14(b)(3)]**

1. Introduction

In accordance with the regulatory requirements set forth in 40 CFR 264.13(b), Rinchem Company, Inc. has developed this Waste Analysis Plan as an integral part of the Part B RCRA Permit Application. The procedures set forth in this plan dictate that this facility will be in compliance with all requirements of 40 CFR 264.13. A copy of this plan will be available at the facility at all times.

In order to make the waste analysis plan eaiser to understand, a few terms should be defined.

Covered Wastes - Wastes which are designated in the Chemical and Physical Analysis section of the permit application (pages 56-62) when and only when they are stored in excess of 10 days or manifested to this facility as a treatment, storage, and disposal facility and signed for by an authorized agent of the facility.

Exempt Wastes - Wastes that do not require a permit because (1) they are not regulated under RCRA as hazardous, or (2) they are not manifested to Rinchem and not stored in excess of 10 days.

The purpose of this Waste Analysis plan is to document the necessary analytical techniques, sampling methodologies, and

procedures appropriate to covered wastes entering the facility. For storage for a period exceeding ten days, three areas are considered:

(1) Pre-Acceptance Procedures - to determine the acceptability of a particular waste stream with regard to facility permit conditions and safe operating capabilities prior to the shipment of that waste stream.

(2) Incoming Load Procedures - to verify that the delivered waste is in accordance with the accompanying waste manifest and the pre-acceptance documentation.

(3) Storage Procedures- to maintain safe and appropriate methods of storage of wastes while at the facility.

2. Pre-Acceptance Procedures

Rinchem Company has developed procedures to determine the acceptability of specific wastes for receipt at the facility. These procedures dictate the information a potential customer must provide to enable Rinchem Company to determine the acceptability of the waste for storage for a period exceeding 10 days.

2.1 Generator Requirements [Federal - 264.13(b)(5)]

For each new waste stream that is a candidate for delivery to the facility, the following procedures are implemented:

(1) The generator will provide Rinchem Company with pertinent chemical and physical data requested on the Generator's Waste

Profile Sheet shown as Figure WAP-1 and a representative sample. The profile includes a certification that the sample is representative and that generator will notify Rinchem of known changes in the waste stream.

(2) Rinchem will verify the data on the Generator's Waste Material Profile Sheet by having confirming analyses performed on the representative sample.

(3) After comparing the data supplied by the generator with that obtained by verification, Rinchem will determine the acceptability of the waste based on the permit conditions of the facility.

2.2 Frequency of Analysis [Federal - 264.13(b)(4)]

The pre-acceptance evaluation will be repeated when a generator notifies Rinchem that the process generating the waste has changed, or if Rinchem has reason to suspect that the waste is in non-conformance with available pre-acceptance documentation, or if a significant discrepency is detected. When the process generating a hazardous waste has changed, the generator must submit a new waste profile sheet and sample.

2.3 Waste Analysis Parameters and Rationale for Selection [Federal - 264.13(b)(1)]

Under this permit, Rinchem plans to enlarge its activities to storing hazardous waste. It would not be feasible to hire personnel

# RINCHEM COMPANY, INC.
## GENERATOR'S WASTE PROFILE SHEET

RINCHEM COMPANY INC.
PHONE (505) 345-3655
6133 EDITH BLVD.NE
ALBUQUERQUE NM 87107

**A. GENERAL INFORMATION**

GENERATOR NAME _____

FACILITY ADDRESS _____ NUMBER _____

_____ GENERATOR USEPA I.D. _____

_____ GENERATOR STATE I. D. _____

TECHNICAL CONTACT: _____ TITLE: _____ PHONE: _____

NAME OF WASTE: _____

PROCESS GENERATING WASTE: _____

**B. PHYSICAL CHARACTERISTICS OF WASTE**

COLOR: Describe _____

Clarity: ☐ Clear ☐ Cloudy
Describe _____

Phase Separation :
Number of layers _____

pH ☐ < 2.0 ☐ 8.1-10.0 ☐ 2.0-4.0 ☐ 10.1-12.5 ☐ 4.1-5.9 ☐ >12.5 ☐ 6.0-8.0 ☐ EXACT _____

SPECIFIC GRAVITY ☐ <.8 ☐ 1.2-1.4 ☐ .8-1.0 ☐ 1.4-1.6 ☐ 1.0-1.2 ☐ >1.6 ☐ EXACT _____

FLASH POINT ☐ < 70 °F ☐ >200°F ☐ 70°F - 140°F ☐ EXACT _____ ☐ 140°F-200°F

**C. CHEMICAL COMPOSITION**

| | RANGE LOWER | UPPER | |
|---|---|---|---|
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |
| _____ | _____ | _____ | % |

**D. METALS** ☐ TOTAL (PPM) ☐ EPA EXTRACTION PROCESS (MG/ML)

ARSENIC _____ SILVER _____
BARIUM _____ COPPER _____
CADMIUM _____ NICKEL _____
CHROMIUM _____ ZINC _____
MERCURY _____ THALLIUM _____
LEAD _____ _____
CHROMIUM HEX _____
SELINIUM _____

**E. OTHER COMPONENTS**

CYANIDES _____ PCB'S _____
SILFIDES _____ PHENOLICS _____

**F. SHIPPING INFORMATION**

D.O.T. HAZARDOUS MATERIAL ☐ YES ☐ NO
PROPER SHIPPING NAME _____
HAZARD CLASS _____
I.D. NO. _____ R.Q. _____
ANTICIPATED VOLUME (UNITS) _____
PER ☐ ONE TIME ☐ WEEK ☐ MONTH ☐ QUARTER ☐ YEAR ☐ _____

**G. HAZARDOUS CHARACTERISTICS**

REACTIVE: ☐ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE ☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER _____

OTHER HAZARDOUS CHARACTERISTICS :
☐ NONE ☐ RADIOACTIVE ☐ ETIOLOGICAL ☐ PESTICIDE MANUFACTURING WASTE ☐ OTHER _____

USEPA HAZARDOUS WASTE
USEPA HAZARDOUS CODES _____, _____, _____, _____

**H. SPECIAL HANDLING INFORMATION** _____

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED. I FURTHER CERTIFY THAT ANY SAMPLES SUBMITTED WITH THIS PROFILE NUMBER ARE REPRESENTATIVE OF THE WASTE TO BE SHIPPED AND ARE TAKEN IN ACCORDANCE WITH SW 846 OR OTHER APPROVED PROCEDURES. I AGREE TO NOTIFY RINCHEM IN WRITING WHEN THE PROCESS GENERATING THIS WASTE STREAM CHANGES OR WHEN I HAVE REASON TO BELIEVE THE DATA CONTAINED HEREIN IS NOT COMPLETE AND ACCURATE.

SIGNATURE _____ TITLE _____ DATE _____

FIGURE WAP-1. WASTE PROFILE SHEET

and to equip a complete laboratory for the limited amount of covered wastes being handled at this facility. Rinchem will maintain laboratory personnel and equipment comensurate with the safe storage and handling of wastes for which it is permitted.

### 2.3.1 Mandatory Analyses

Mandatory Analyses include five basic screening procedures to be performed on all covered waste streams. They will provide a general characterization of the waste, and indicate compatibility with other materials in the same building.

(1) Physical Description - is used to determine the general characteristics of the waste which facilitates comparison of the sample waste with prior waste descriptions or samples.

(2) pH Screening - is used to indicate the corrosive nature of the waste and to ensure that no highly alkaline or acidic wastes are stored in a flammable area and that wastes are compatible with their containers.

(3) Specific Gravity - is selected because significant changes are strongly indicative of changes in waste characteristics.

(4) Ignitable Screen - is used to indicate the fire-producing potential of the waste, and to determine whether the waste is a RCRA ignitable waste or is regulated as flammable or combustible by

the federal DOT. This test can be applied to all waste liquids, or semi-solids.

(5) Assay - is obtained by a gas chromatograph to confirm identity, amount of recoverable component(s), and major contaminents, if any.

2.3.2 Supplemental Analyses

Supplemental analyses are preformed to provide the Hazardous Waste Coordinator with another level of confidence concerning the proper means of storage should the need arise. Some of these additional analyses utilize unique procedures which have been found preferable for waste characterization. Others are standard analytical techniques recognized by EPA and ASTM. Rinchem will perform the supplemental analyses if possible. If Rinchem does not have the equipment to perform certain analytical procedures, waste samples will be sent to an outside laboratory that will be able to characterize the waste stream further.

The applicability of the analysis parameters described below is based on procedures and protocol formulated by Rinchem Company, Inc.

(1) Distillation - is used to determine the percent recovery and boiling range of a sample, and to generate distillate and bottoms samples for further testing.

(2) Liquid Waste Compability - is to determine whether liquid

wastes if stored or processed together are compatible.

(3) Beilstein Copper Wire Test for Organic Chlorides - is to detect the presence of organic chlorides in the wastes prior to acceptance. If the Beilstein test is positive, then a total organic halogen analysis will be performed to determine the exact chloride concentration.

(4) Heavy Metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag) - are run to quantify heavy metals concentration to determine process operating parameters.

(5) Flash Point - further characterizes ignitable wastes to establish proper storage mode and conformance with permit conditions.

(6) Water Content - is to determine the amount of free water or indicate the combustibility of the waste.

(7) Heat Value - assesses the amount of heat available for release during thermal combustion (incineration or use as fuel supplement).

(8) Total Organic Halides - is used to quantify the halides that are present in the waste stream.

## 2.4 Test Methods for Analyzing Parameters

All the test methods for mandatory and supplemental analyses at the Rinchem facility are found in Appendix WAP-B.

## 2.5. Procedures for Collecting Representative Samples [Federal - 263.14(b)(3)]

Rinchem performs sampling at its own facility and often assists generators in sampling at their location. Waste generators are referred to 40 CFR 261, Appendix I for sampling procedures. Specific sampling methods used by Rinchem Company personnel are divided into three subsections: (1) description of sampling device, (2) personnel safety precautions, and (3) sampling procedure for drums.

### B.2.5.1. Description of Sampling Device

The sampling device that will be used to sample drums is a Coliwasa type sampler. Figure WAP-2 is a schematic of the Coliwasa type sampler used (following page). There are limitations in the effectiveness of the Coliwasa type sampler:

(1) Use of a plastic Coliwasa type sampler, unless it is constructed of fluorocarbons (e.g. Teflon), to sample wastes containing organic materials may contaminate the sampler.

(2) If significant amounts of solid material are present within 2 inches of the bottom of the container, special procedures will be necessary to obtain a representative sample of this solid phase.

(3) A clean dry sampler must be used for each sampler to prevent cross contamination.

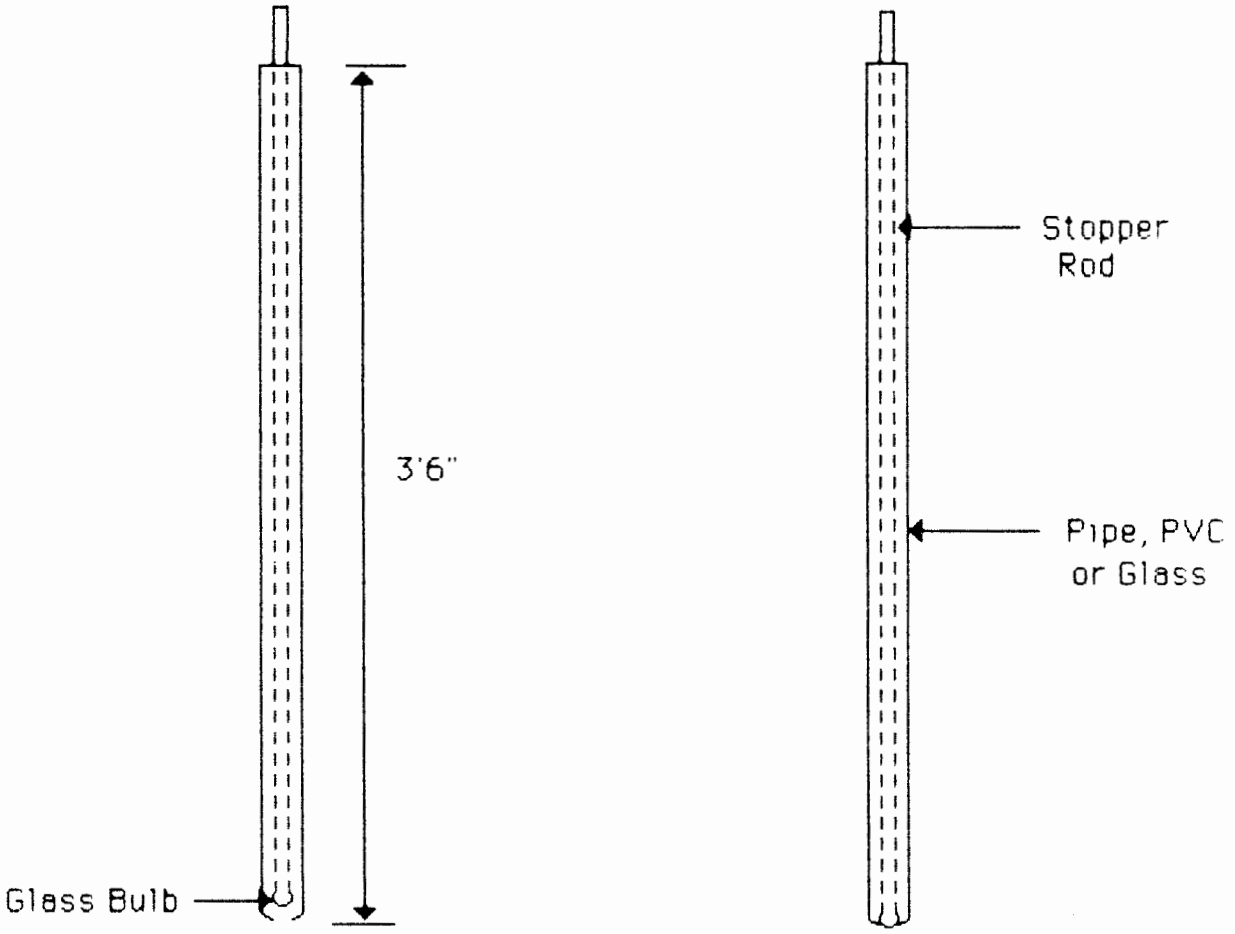


Figure WAP-2. Schematic of a Coliwasa Type Sampler

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2.5.2. Personnel Safety Precautions

Prior to opening the container for sample withdrawal, the employee who is to do the sampling must be wearing safety glasses, gloves, and a long-sleeved chemical resistant apron or suit.

The equipment required in order to obtain a sample consists of:

(1) A Bung wrench

(2) A Coliwasa type sampling tube

(3) A clean, dry sample bottle

(4) A screw cap for the sample bottle

(5) A label containing the following information:

(i) The manifest or profile number corresponding to the waste shipment

(ii) The name of the waste being sampled

(iii) The date on which the sample is taken

(iv) The name of the employee withdrawing the sample

2.5.3. Sampling Procedures for Drums

NON AQUEOUS SAMPLES

Samples should be taken in glass containers. Caution should be taken to always leave at least one-half inch of free space in the sample bottle before it is closed. Never fill the sample bottle to the brim. Quite frequently the sample is withdrawn at a temperature which is less than the storage temperature. As the temperature increases, the sample will expand. If the bottle is filled, the

2.5.2. Personnel Safety Precautions

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   (i) The manifest or profile number corresponding to the waste shipment

   (ii) The name of the waste being sampled

   (iii) The date on which the sample is taken

   (iv) The name of the employee withdrawing the sample

Caution should be taken to always leave at least one-half inch of free space in the sample bottle before it is closed. Never fill the sample bottle to the brim. Quite frequently the sample is withdrawn at a temperature which is less than the storage temperature. As the temperature increases, the sample will expand. If the bottle is filled, the expanding sample will have no room and the bottle may deform or break.

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expanding sample will have no room and the bottle may deform or break.

AQUEOUS SAMPLES

When sampling for organics in an aqueous solution, care should be taken to assure there is no air space in the sample container, since many solvents are very volatile, and they could disperse into the air space, and be undetected by the laboratory. These samples probably should be collected in plastic bottles to allow for liquid expansion, and insure sample container integrity

The following steps will be taken while sampling a drum:

(1) Sampling is to be done on the receiving dock at Rinchem or at a well ventilated location away from ignition sources. Do not open containers in Rinchem's warehouse.
(2) Sampling is done through the bung on the drum. When removing the bung closure of the drum, loosen it slightly without completely removing the bung in order to relieve any internal pressure.
(3) Remove the bung closure completely.
(4) Open the bottom of the Coliwasa type sampler completely.
(4) Slowly lower the sampler into the drum until the bottom of the sampler reaches the bottom of the drum. If the sample is lowered faster than it can fill, the sample will be not representative of the waste shipment.
(5) Close the bottom stopper of the Coliwasa type sampler.

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(3) Remove the bung closure completely.

(4) Open the bottom of the Coliwasa type sampler completely.

(4) Slowly lower the sampler into the drum until the bottom of the sampler reaches the bottom of the drum. If the sample is lowered faster than it can fill, the sample will be not representative of the waste shipment.

(5) Close the bottom stopper of the Coliwasa type sampler.

(6) Withdraw the Coliwasa type sampler.

(7) Transfer the content of the sampler to the sample bottle.

(8) Screw the cap onto the bottle.

(9) Wipe any spillage from the outside of the bottle.

(10) Affix and complete the appropriate label to the bottle.

(11) Clean the Coliwasa type sampler before it is used again.

(12) Inspect the gasket on the drum closure to make sure it is in good condition (replace if necessary).

(13) Reseal the drum.

(14) Take the samples to the sample storage area.

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(7) Transfer the content of the sampler to the sample bottle.

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(13) Reseal the drum.

(14) Take the samples to the sample storage area.

2.6. Waste Analysis Procedures and Methods for Waste Ignitability, Reactivity, or Incompatibility [Federal-264.13(b)(6) & 264.17(c)]

Many of the wastes handled by Rinchem are ignitable wastes. The flash point range of the wastes will be determined for each waste stream. A detailed description of the procedures used to store the hazardous, reactive, and incompatible wastes is described in the Procedures and Prevention subsection of this permit.

3. Incoming Load Procedures

3.1 Consistency Between Waste and Manifest

Most of the waste delivered to the facility is in the Rinchem trucks. Each shipment and drum of covered waste is checked in

2.6. Waste Analysis Procedures and Methods for Waste Ignitability, Reactivity, or Incompatibility [Federal-264.13(b)(6) & 264.17(c)]

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3. Incoming Load Procedures

3.1 Consistency Between Waste and Manifest

Most of the waste delivered to the facility is in the Rinchem trucks. Each shipment and drum of covered waste is checked in accordance with the Pre-Acceptance Inspection Sheet shown in Figure WAP-3 (following page). This verification may be completed either as the shipment is loaded or unloaded. The form must be completed and signed by a trained and authorized employee. Sampling will be carried out as described in the Sample Procedures subsection that follows (page 15).

Once the shipment is accepted, the drums will be removed to the designated hazardous waste storage area.

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accordance with the Pre-Acceptance Inspection Sheet shown in Figure WAP-3 (following page). This verification may be completed either as the shipment is loaded or unloaded. The form must be completed and signed by a trained and authorized employee. Sampling will be carried out as described in the Sample Procedures subsection that follows (page 16).

Once the shipment is accepted, the drums will be removed to the designated hazardous waste storage area.

**RINCHEM COMPANY, INC.**
**GENERATOR'S WASTE PROFILE SHEET**

RINCHEM COMPANY INC.
PHONE (505) 345-3655
6133 EDITH BLVD NE
ALBUQUERQUE NM 87107

**A. GENERAL INFORMATION**

NERATOR NAME _____

FACILITY ADDRESS _____ NUMBER _____

_____ GENERATOR USEPA I.D _____

_____ GENERATOR STATE I. D _____

TECHNICAL CONTACT _____ TITLE _____ PHONE _____

NAME OF WASTE _____

PROCESS GENERATING WASTE _____

Inspector's name _____ / _____ Date of Inspection _____

| TYPES OF PROBLEMS | STATUS ACCEPTABLE (A) OR UNACCEPTABLE (U) |
|---|---|
| Stored Containers | |
| - Check manifest compliance to instructions in Schedule A | ☐A ☐U |
| - Yellow Hazardous Waste labels on drums match data on manifest | ☐A ☐U |
| - Check for appropriate DOT hazard labels | ☐A ☐U |
| - Ensure all inappropriate labelling is removed or painted out | ☐A ☐U |
| - Check drums for the following: | |
| a. DOT approved containers only (Check for DOT stamp on odd looking drums) | ☐A ☐U |
| b. Appropriateness for material (generally, closed head drum - liquid, metal drum - organics, poly or poly-lined drum - corrosives) | ☐A ☐U |
| c. No leaks, bungs sealed, no deep dents or creases, filled at least 24 hours before pick up of the shipment | ☐A ☐U |
| d. No liquids or dried waste on exterior (including top) | ☐A ☐U |
| - Before signing manifest, confirm quantity of each stream (number of items received and loaded same as number manifested) | ☐A ☐U |

It is vital to be firm, but very courteous when dealing with customers regarding suspected discrepencies. If they don't readily agree that changes are necessary, ask for permission to contact your supervisor. We do not reject shipments without every effort to rectify non-compliance and we do not accept shipments until they comply.

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Figure WAP-3. Pre-Acceptance Inspection Sheet

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**RINCHEM COMPANY, INC.**
**PRE-ACCEPTANCE INSPECTION SHEET**

PHONE (505) 345-3655
RINCHEM COMPANY INC.
6133 EDITH BLVD.NE
ALBUQUERQUE NM 87107

**A. GENERAL INFORMATION**

GENERATOR NAME _____

FACILITY ADDRESS _____ NUMBER _____

_____ GENERATOR USEPA I. D. _____

_____ GENERATOR STATE I. D. _____

TECHNICAL CONTACT: _____ TITLE: _____ PHONE: _____

NAME OF WASTE: _____

PROCESS GENERATING WASTE: _____

Inspector's Name _____ Date of Inspection _____

| TYPES OF PROBLEMS | STATUS ACCEPTABLE (A) OR UNACCEPTABLE (U) |
|---|---|
| Stored Containers | |
| - Check manifest compliance to instructions in Schedule A | ☐ A ☐ U |
| - Yellow Hazardous Waste labels on drums match data on manifest | ☐ A ☐ U |
| - Check for appropriate DOT hazard labels | ☐ A ☐ U |
| - Insure all inappropriate labeling is removed or painted out | ☐ A ☐ U |
| - Check drums for the following:<br>a. DOT approved containers only (Check for DOT stamp on odd looking drums) | ☐ A ☐ U |
| b. Appropriateness for material (generally, closed head drum--liquid, metal drum--organics, poly or poly-lined drum-- corrosives) | ☐ A ☐ U |
| c. No leaks, bungs sealed, no deep dents or creases, filled at least 24 hours before pick up of shipment | ☐ A ☐ U |
| d. No liquid or dried waste on exterior (including top) | ☐ A ☐ U |
| - Before signing manifest, confirm quantity of each stream (number of items recieved and loaded same as number on manifest) | ☐ A ☐ U |

It is vital to be firm, but very courteous when dealing with customers regarding suspected discrepancies If they don't readily agree that changes are necessary, ask for permission to contact your supervisor. We do not reject shipments without every effort to rectify non-compliance and we do not accept shipments until they comply

Figure WAP-3 Pre-Acceptance Inspection Sheet

## 3.2 Fingerprint Waste Analysis Parameters [Federal - 264.13(c)]

Upon receipt of a shipment, Rinchem has the responsibility of measuring a sufficient number of parameters to insure that the customer did indeed send what was profiled and accepted. This consideration leads to the selection of "fingerprint" parameters, the measurement of which will provide reasonable assurance that the drums received from a generator agree with the accompanying manifest. The following data will be determined at the facility on samples taken from an appropriate number of drums from each waste stream:

(1) Physical state of the spent solvent including color, clarity, and phase separation.

(2) pH of the waste stream

(3) Specific gravity of the waste stream

The test methods used for the fingerprint analysis are the same as are already described in the previous subsection entitled, "Test Methods for Analyzing Parameters" (page 7).

## 3.3 Tolerance Levels for Fingerprint Analysis

The results of the measurements of the fingerprint parameters selected for a given waste stream will be compared to the values obtained from previous shipments of the stream and will be required to fall within an established tolerance limit ("plus or minus") for that parameter. At this time, Rinchem has no long term customers who store waste at this facility and consequently no body of historical

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information with which tolerance levels could be calculated. Until sufficient information is obtained to permit establishing a "specification" for an acceptable waste stream, two approaches will be undertaken to provide standards against which to compare subsequent samples taken from a given waste stream upon its arrival at this facility:

(1) For a quantitative value (e.g. specific gravity), plus or minus 10% of the value determined from the pre-shipment sample will be used as a tolerance level.

(2) For qualitative values (color, phase separation, etc.) comparison against a retained sample stored at the facility from a previous sample. A significant deviation in color or general appearance will lead to consideration of rejection of the shipment.

3.4 Procedures for Collecting Representative Shipment Samples

The method for sampling the drums in each shipment has already been explained in the preceeding subsection entitled " Procedures for Collecting Representative Samples" (page 7). The number of drums that will be sampled will be according to the cube root equation. The cube root of the number of drums in the shipment will be the number that will be sampled for each shipment. The source for this cube root procedure is the American Society for Testing and Materials, Method D 140-70. This procedure is described in more detail in Appendix WAP-C. For a typical load, the formula provides the following:

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information with which tolerance levels could be calculated. Until sufficient information is obtained to permit establishing a "specification" for an acceptable waste stream, two approaches will be undertaken to provide standards against which to compare subsequent samples taken from a given waste stream upon its arrival at this facility:

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| Drums Received | Drums Sampled |
|---|---|
| 1 | 1 |
| 2-8 | 2 |
| 9-27 | 3 |
| 28-64 | 4 |
| 65-125 | 5 |

The drums to be sampled will be chosen at random by the person taking the samples.

3.5 Procedures for Rejecting Shipments of Wastes

The general logic utilized by the Hazardous Waste Coordinator (or his designee) in deciding whether to accept or reject a particular load is shown in Figure WAP-4 (following page). There are major points that need to be evaluated by the Hazardous Waste Coordinator. The decision to accept or reject the waste shipment depends on the following considerations:

(1) Failure to prequalify waste stream or provide appropriate data
(2) Wastes for which Rinchem is not permitted
(3) Waste shipments that contain components such as radioactive and/or explosive wastes
(4) Improper or inappropriate packaging, labeling, or manifesting
(5) Characteristic quantity or composition discrepencies between the waste and the waste manifest or profile
(6) Values for fingerprint analysis parameters that are out of the tolerance levels set by the Rinchem Company

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(6) Values for fingerprint analysis parameters that are out of the tolerance levels set by the Rinchem Company

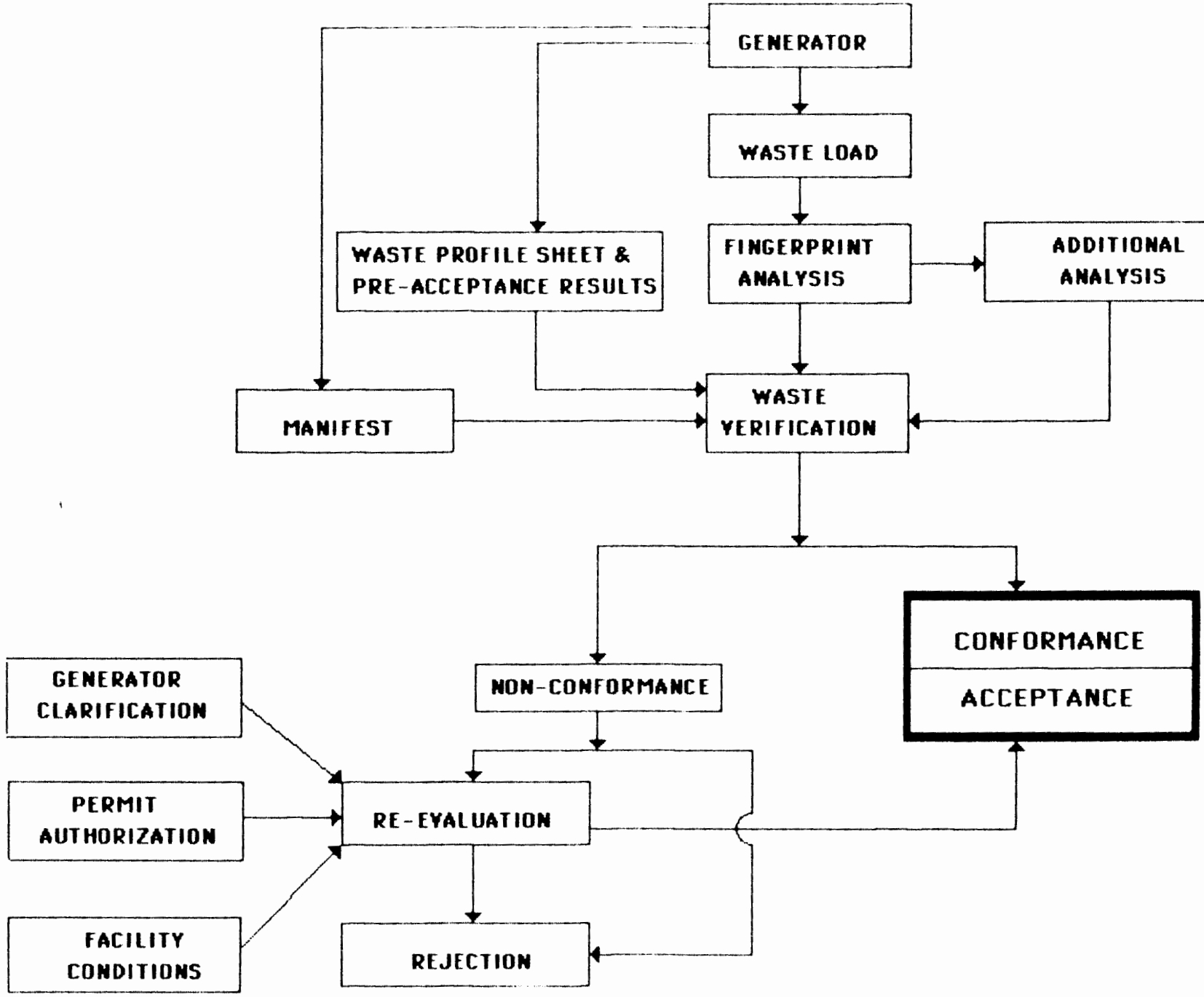


Figure WAP 4 Incoming Load Verification Logic Diagram

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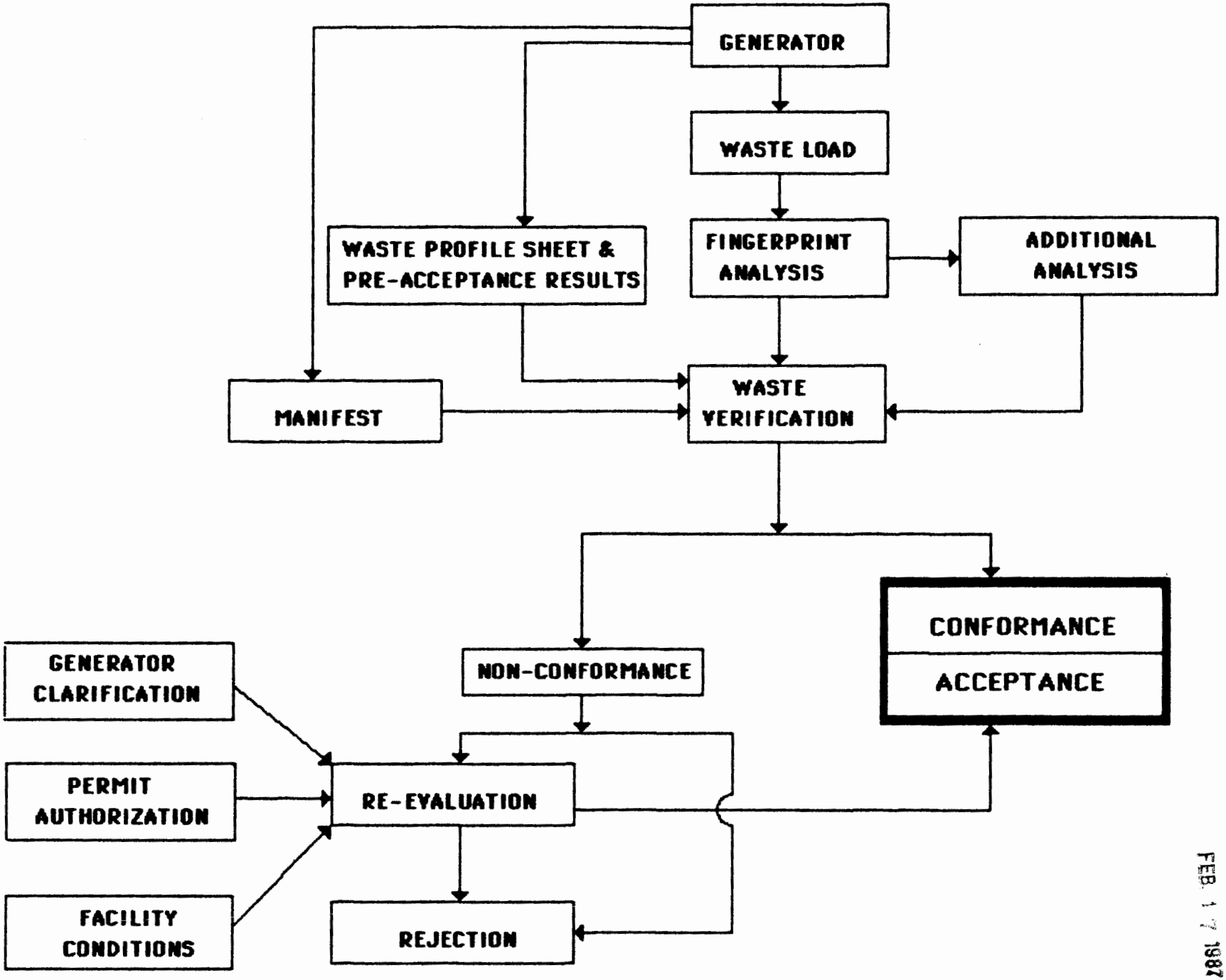


Figure WAP-5. Incoming Load Verification Logic Diagram



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(7) Lack of credit approval.

The Hazardous Waste Coordinator (or designee) must classify the waste unacceptable for storage at the Rinchem Company facility if it is significantly different in compostion or volume from the information shown in the waste profile sheet, the pre-acceptance analysis of the representative sample, or on the manifest. Containers are counted to determine quantity discrepency.

Wastes found to be in non-conformance may be rejected or they may be reevaluated for possible acceptance by the facility despite the variance. Rinchem's reevaluation procedure is designed to determine whether a waste material can be handled at the facility and whether the generator concurs with the characterization conducted by Rinchem Company. The Hazardous Waste Coordinator evaluates the shipment according to the following criteria:

(1) Permit requirements of the Rinchem Company facility

(2) Discussions with the generator

(3) Facility parameters for storage

(4) Need for additional supplemental analyses.

If all of the above parameters including supplemental analysis indicate the waste can be accepted and the generator concurs, new manifests or profiles may be created as necessary to insure compliance. If a discrepency cannot be resolved within 15 days of shipment receipt, the appropriate regulatory agencies will be notified, in writing, of the discrepency and of attempts to reconcile it,

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The Hazardous Waste Coordinator (or designee) must classify the waste unacceptable for storage at the Rinchem Company facility if it is significantly different in compostion or volume from the information shown in the waste profile sheet, the pre-acceptance analysis of the representative sample, or on the manifest. Containers are counted to determine quantity discrepency.

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including a copy of the involved manifest.

4. Storage Procedures

Storage procedures are intended to insure that no hazard will befall the personnel of Rinchem and/or the environment. Wastes that are radioactive and/or explosive will not be accepted at the Rinchem Company facility. A more detailed discussion of the procedures that are used at the Rinchem facility for ignitable and incompatible wastes is given in the Prevention and Procedure subsection of the permit application.

In the event that a spill should occur and a hazardous waste should be contained by the secondary containment system, the following steps will be taken to analyze the waste for its physical and chemical characteristics:

(1) The labels on the drum(s) that caused the spill will be checked for the waste stream that was contained in that drum.

(2) The waste analysis data on that waste stream will be retrieved from the waste analysis files at the Rinchem Company facility.

(3) The spill will be analyzed using fingerprint analysis parameters and will be compared to the analysis that is on file for particular waste stream.

(4) If discrepencies appear between the fingerprint analysis completed on the spill and the analysis on file at the facility, the drum(s)' labels will be rechecked and additional analysis will be done on the spill if appropriate.

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including a copy of the involved manifest.

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Storage procedures are intended to insure that no hazard will befall the personnel of Rinchem and/or the environment. Wastes that are radioactive and/or explosive will not be accepted at the Rinchem Company facility. A more detailed discussion of the procedures that are used at the Rinchem facility for ignitable and incompatible wastes is given in the Prevention and Procedure subsection of the permit application.

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(3) The spill will be analyzed using fingerprint analysis parameters and will be compared to the analysis that is on file for particular waste stream.

(4) If discrepencies appear between the fingerprint analysis completed on the spill and the analysis on file at the facility, the drum(s)' labels will be rechecked and additional analysis will be done on the spill if appropriate.

(5) Having identified the important physical and chemical characteristics of the waste spill, appropriate action will be taken to insure that the spill is safely and adequately neutralized and cleaned up.

More detailed information about the procedures for cleaning up a hazardous waste spill can be found in the Contingency Plan (page CP-9).

Replaced by 2/17/87

(5) Having identified the important physical and chemical characteristics of the waste spill, appropriate action will be taken to insure that the spill is safely and adequately neutralized and cleaned up.

More detailed information about the procedures for cleaning up a hazardous waste spill can be found in the Contingency Plan (page CP-9).

# APPENDIX WAP-A

# RINCHEM COMPANY'S QUALITY CONTROL POLICY

## Quality Assurance/Quality Control Policy

A. Program Goal

Our program's goal is to obtain accurate and precise data on waste characterstics and to maintain an up-to-date log of those data. The analytical data we obtain are available for the following reasons:

(1) We need to be sure the waste received at our facility are wastes that the facility is permitted to store.

(2) Data is on file on the individual waste shipments should a spill occur.

(3) Notification can be made to the organic solvent recovery facility and/or the incineration facility of changes in the characteristics of the waste streams.

(4) Find the kind and amount of chemical(s) that can be recovered using a recovery process.

B. Sampling Program

Several people at the Rinchem facility are trained to be samplers. They have been properly trained to sample the waste using the equipment described in the subsection entitled "Procedures for Collecting Representative Samples" (page 10). A description of their training is found in the Training section of this permit application. Their sampling skills are evaluated regularly by our

Hazardous Waste Coordinator. This appears to be sufficient because waste streams are routinely sampled on an annual basis.

When samples are taken, our employee logs vital data on a Fingerprint Analysis form (Refer to Figure WAPA-1, next page), labels the containers (See Figure WAPA-2, page A-4), and hand carries them to a designated storage area.

C. Analysis Program

Our personnel have been trained to perform the analytical techniques that have been discussed in this Waste Analysis Plan (page 9) in order to adequately analyze incoming waste shipments. This Part B application contains a description of their training program.

Prior to analyzing the samples, the company's equipment is calibrated according to the specific manufacturer's instructions for each piece of equipment. Recalibration is carried out on a regular basis. The employee's analytical techniques and the company's analytical equipment are checked regularly with blanks and known standards. Problems that are apparent upon completion of the quality control check will be resolved by taking appropriate actions.

**RINCHEM COMPANY INC.**

# WASTE ANALYSIS SHEET

**A. GENERAL INFORMATION**

GENERATOR NAME _____

FACILITY ADDRESS _____ NUMBER _____

_____ GENERATOR USEPA I.D. _____

_____ GENERATOR STATE I. D. _____

TECHNICAL CONTACT: _____ TITLE: _____ PHONE: _____

NAME OF WASTE: _____

PROCESS GENERATING WASTE: _____

**B. Fingerprint Analysis or Initial Waste Analysis**

**1. Physical Description**

A. Color: Describe _____

B. Clarity: ☐ Clear ☐ Cloudy

Describe _____

C. Phase Separation: Number of Layers _____

**2. Sample pH**

☐ < 2.0 ☐ 2.0 - 4.0 ☐ 4.0 - 6.0 ☐ 6.0 - 8.0 ☐ 8.0 - 10 ☐ 10.0-12.5 ☐ >12.5

Exact _____ ( if necessary)

**3. Specific Gravity**

☐ < .8 ☐ .8 - .9 ☐ .9 - 1.0 ☐ 1.0 - 1.1 ☐ 1.1 - 1.2 ☐ 1.2 - 1.3 ☐ 1.3 - 1.4 ☐ 1.4 - 1.5 ☐ 1.5 - 1.6 ☐ 1.6 - 1.7 ☐ > 1.7

☐ Exact _____

**4. Ignitable Screen (Flash Point)**

☐ < 70 °F

☐ 70 °F - 140 °F

☐ > 140 °F

Exact (if necessary) _____

**5. Assay (Composition)**

| | Range High | Range Low | | Range High | Range Low |
|---|---|---|---|---|---|
| _____ | _____% | | _____ | _____% | |
| _____ | _____% | | _____ | _____% | |
| _____ | _____% | | _____ | _____% | |
| _____ | _____% | | _____ | _____% | |
| _____ | _____% | | _____ | _____% | |

**E. Other Supplemental Analysis (if necessary)** _____

_____

_____

Figure WAPA-1.
Waste Analysis Sheet

RINCHEM COMPANY INC.
6133 EDITH BLVD.NE
ALBUQUERQUE NM 87107
PHONE (505) 345-3655

Manifest # _____ or Profile # _____

Waste Stream Name _____

Date Sampled _____

Samplers Name _____

Comments:

Figure WAPA-2. Sample Container Label

Source: "Test Methods for Evaluating Solid Wastes," SW-846, July 1982

# APPENDIX WAP-B

## DESCRIPTION OF TEST METHODS FOR WASTE ANALYSIS PARAMETERS USED AT RINCHEM COMPANY, INC.

Analytical methods described herein are grouped in accordance with the two catagories identified in the Waste Analysis Plan, mandatory analyses and supplementary analyses.

## B.1 Mandatory Analyses

Physical Description - Samples are inspected and the physical appearance of the waste is recorded, including color, viscosity, physical state (solid, semi-solid, or liquid), layering (if multiple phases are present, color and viscosity are reported for each layer), and presence of free liquid.

pH Screen - Full-range pH paper may be used as an initial screening method. If this intitial screen indicates a pH near the limits of 3 or below, or 11.5 and above, a pH meter, as referenced in §261.22 will be used. A pH meter is used directly on liquid samples and on the free liquid portion of liquid/solid samples.

Specific Gravity - Preliminary checking of specific gravity need only be approximate. Testing for specific gravity is performed at room temperature rather than under controlled conditions. An apporopriate hydrometer will be placed in a 100 ml graduated cylinder containing about 70 ml of the sample liquid. The specific gravity is read from the hydrometer scale where it is crossed by the bottom of the miniscus of the sample. When more accurate measurements are needed, the specific gravity will be measured in accordance with ASTM D2111-71.

Ignitable Screen - A small amount of a liquid waste sample is placed into a five mm container. An ignition source is introduced into the vapor zone immediately above the sample. For liquid samples, the flash point is recorded as less than 70 °F if the sample ignites at room temperature. If not, the sample temperature is elevated to approximately 140 °F. The ignition source is introduced again. If the sample ignites, the flash point is recorded as greater than 70 °F but less than 140 °F. If the sample does not ignite after sustained heating or boiling is observed, the flash point is recorded as greater than 140 °F. Halogenated solvents typically give off vapors that burn with a yellow, smokey flame in the presence of an external flame. Wastes with this type of non-sustaining flame are reported as having a flash greater than 140 °F.

Assay - The gas chromatograph techniques that will be used at the Rinchem facility will depend on the class of compounds that will be tested for. Exact quantification of all the components is not necessary. The verification procedure requires only that the presence or absence of the components which render the waste hazardous and which have been declared by the generator be verified. Significant unknown peaks can be investigated further with other common laboratory techniques if necessary.

B.2 Supplemental Analyses

Distillation - In an appropriate size stand flask/condenser distillation set-up, add known quantity of sample and boiling chips.

Apply heat with an electrically-heated oil bath or steam. During distillation, maintain heat so that a drop of liquid remains on the thermometer bulb. Monitor temperature and collected volume of each fraction.

Liquid Waste Compatability - Samples of liquid wastes are added to each other in proportion to their final mixed volumes. The generation of heat, gases, precipitates, increase in viscosity, and layering are noted. Unacceptable reactions are the generation of pressure greater than 50 psi and/or a heat rise greater than 20 °C. Viscosity will be measured using a viscometer. Layering and precipitates will be measured on a volume/volume basis in a graduated cyclinder.

Beilstein Copper Wire Test for Organic Chlorides - A copper wire is put into a flame until there is a colorless flame. The copper is then put into a sample of the waste. The wire is placed in the flame again. If a green flame can be seen, the copper wire test is positive for organic chlorides.

B.3 Standard Supplemental Analyses

(Appendix WAP-B usually contains all the procedures used at the Rinchem facility. However, since these procedures are standard methods, the test method number and reference only are included in this permit application.)

| PARAMETER | TEST METHOD | REFERENCE |
|---|---|---|
| Inorganic Techniques: | | |
| (preperatory techniques) | | |
| Acid Digestion Flame | | |
| Adsorption Spec. | 3010 | 1 |
| Acid Digestion Furnace | | |
| Adsorption Spec. | 3020 | 1 |
| Acid Digestion of Oils, | 3030 | 1 |
| Greases, and Waxes | | |
| Dissolution for Oils, | 3040 | 1 |
| Greases, and Waxes | | |
| Heavy Metals: | | |
| Arsenic | 7060 | 1 |
| | 7061 | 1 |
| Barium | 7080 | 1 |
| | 7081 | 1 |
| Cadmium | 7130 | 1 |
| | 7131 | 1 |
| Chromium | 7190 | 1 |
| | 7191 | 1 |
| Lead | 7420 | 1 |
| | 7421 | 1 |
| Mercury | 7470 | 1 |
| | 7471 | 1 |
| Selinium | 7740 | 1 |
| | 7741 | 1 |
| Silver | 7760 | 1 |
| | 7761 | 1 |

| | | |
|---|---|---|
| Flash Point (Pensky Martens closed-cup method) | 1010 | 1 |
| Water Content | By material | 2 |
| Heat Value | D240 | 2 |
| Total Organic Halides | E442 - 74 | 2 |

[1] "Test Methods for Evaluating Solid Waste," 2nd Edition, SW-846, U.S. Environmental Protection Agency, Office of Water and Waste Management, Washington, D. C. 20406, July, 1982.

[2] "Annual Book of ASTM Standards," American Society for Testing Materials, 1916 Race Street, Philadelphia, Pennsylvania 19103.

# APPENDIX WAP-C

## ESTIMATING DRUM SAMPLE SIZE

(Recopied from "Waste Analysis Plans, A Guidance Manual", EPA/530-SW-84-012, United States Environmental Agency, Washington D.C., October 1984.)

# APPENDIX C

## DRUMMED WASTES - ESTIMATING SAMPLING SIZE

**Designation: D 140 - 70**

AMERICAN SOCIETY FOR TESTING AND MATERIALS

1916 Race St., Philadelphia, Pa., 19103

Reprinted from the Annual Book of ASTM Standards Copyright ASTM

## Standard Methods of SAMPLING BITUMINOUS MATERIALS[1]

This Standard is issued under the fixed designation D 140; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval.

### 12. Sampling Semisolid or Uncrushed Solid Materials

12.1 *Drums, Barrels, Cartons, and Bags*—Where the lot of material to be sampled is obviously from a single run or batch of the producer, one package shall be selected at random, and sampled as described below. Where the lot of material to be sampled is not obviously from a single run or batch of the producer, or where the single samples selected as described above fails on test to conform to the requirements of the specifications, a number of packages shall be selected at random equivalent to the cube root of the total number of packages in the lot. The following table is given, showing the number of samples to be selected for shipments of various sizes.

| Packages in Shipment | Packages Selected |
|---|---|
| 2 to 8 | 2 |
| 9 to 27 | 3 |
| 28 to 64 | 4 |
| 65 to 125 | 5 |
| 126 to 216 | 6 |
| 217 to 343 | 7 |
| 344 to 512 | 8 |
| 513 to 729 | 9 |
| 730 to 1000 | 10 |
| 1001 to 1331 | 11 |

Samples shall be taken from at least 3 in. (76 mm) below the surface and at least 3 in. from the side of the container. A clean hatchet may be used if the material is hard enough to shatter and a broad, stiff putty knife if the material is soft. When more than one package in a lot is sampled, each individual sample shall be not less than ¼ lb (0.1 kg) in weight. When the lot of material is obviously from a single run or batch of the producer, all samples from the lot shall be melted and thoroughly mixed, and an average 1-gal (4-dm³) sample taken from the combined material for examination. In case more than a single run or batch of the producer is present and the batches can be clearly differentiated, a composite 1-gal sample shall be prepared for examination from each batch. Where it is not possible to differentiate between the various batches, each sample shall be examined separately.

# Appendix B

## Training Lesson Outlines

# APPENDIX B.

# TRAINING OUTLINES

C.1 GENERAL OVERVIEW

Lesson #1

Purpose: To introduce the trainee to an overview of the hazards inherent in the handling of hazardous wastes and/or hazardous chemicals.

Topics Discussed:

I. Labeling
   A. Requirements
   B. Exceptions

II. Health Hazards
   A. Chemical Entry into Body
   B. Chemical Classifications
   C. Toxicity Testing

III. Physical Hazards
   A. Flammable Solids
   B. Flammable Liquids
   C. Flammable Gases
   D. Combustible Liquids
   E. Gases
   F. Explosives
   G. Oxidizers

H. Organic Peroxides

I. Pyrophoric Materials

J. Unstable Materials

K. Water Reactive Materials

IV. Material Safety Data Sheet

A. Hazardous Ingredients

B. Physical Characteristics

1. Boiling Point
2. Vapor Pressure
3. Vapor Density
4. Solubility
5. Appearance and Odor
6. Specific Gravity
7. Percent Volatility
8. Evaporation Rate

C. Fire and Explosion Hazards

1. Flashpoint
2. Fire Hazards

D. Health Hazards

1. Time Weighted Average
2. Ceiling Levels
3. Maximum Peaks
4. First Aid

E. Spill and Leak Procedures

1. Monitoring Equipment
2. Protective Equipment

F. Special Precautions

TEST: LESSON NO. 1

Instructor _____ Date _____

Employee's Name _____ Grade _____

Job Specification _____

1. Name four chemical hazardous waste classifications.

2. Name three ways chemicals can enter the body.

3. Name some dangers that occur when a flammable liquid evaporates into a flammable vapor in the atmosphere.

4. What is an oxidizer?

5. Define the word pyrophoric.

6. What is the vapor pressure of a liquid?

7. What is a Material Safety Data Sheet?

8. What does the flashpoint of a liquid signify?

9. What does specific gravity mean?

10. What is the TLV of a chemical?

C.2 TOUR OF FACILITY

Lesson #2

Purpose: To introduce the trainee to the safey features of the facility as well as the location of important emergency equipment.

(Note: During the tour of the facility, all the features listed below should be mentioned but not necessarily in the order that they are listed in this outline.)

Topics Discussed:

I. Safety Features in Building Construction
   A. Fire Protection Features
      1. Construction Material
      2. Roll-up Fire Resistive Doors
      3. Use of Skylights in Warehouse
      4. Division of Building into Flammable and Nonflammable areas
      5. Four-Hour Fire Wall
      6. Electrical Equipment Rated Explosion Proof
      7. Temperature Controlled Rooms
      8. Designated Smoking Area
      9. Sprinkler System
   B. Emergency Exits
      1. Two Exits from Each Room in Facility
      2. No Area in Facility is More Than 75 Feet From an Exit

C. Spill Protection Features

1. Floors Recessed Four Inches Below Stemwall
2. Aisle Space Adequacy
3. Marked Line on Northern Half of Facility
4. Combustible (Southern) Half Secondary Containment System
   a. Floors covered with sealant
   b. Sloped floors
   c. Southern half are connected to drainage system
   d. Concrete tank inside concrete tank to contain spill behind building
5. Ground Water Monitoring Well

II. Emergency Equipment Locations

A. Five Emergency Shower and Eye Wash Stations (keep access clear)

B. Six Fire Extinguishers (keep access clear)

C. One First Aid Station (keep access clear)

D. One Hazardous Waste Spill Pack (keep access clear)

E. Two Pull Stations for Internal Alarm (keep access clear)

F. Pump for Dry Pipe Sprinkler System (keep access clear)

TEST: LESSON NO. 2

Instructor _____ Date _____

Employee's Name _____ Grade _____

Job Specification _____

1. Where are the combustible materials stored?

2. What precautions are taken against soil contamination if a hazardous waste spill should occur?

3. What precautions should be taken in regard to fire extinguishers, emergency showers, first aid kit, and pull stations?

4. Why is the floor recessed four inches below the stemwall?

5. On the attached diagram, fill in the location of the following using the signs given.

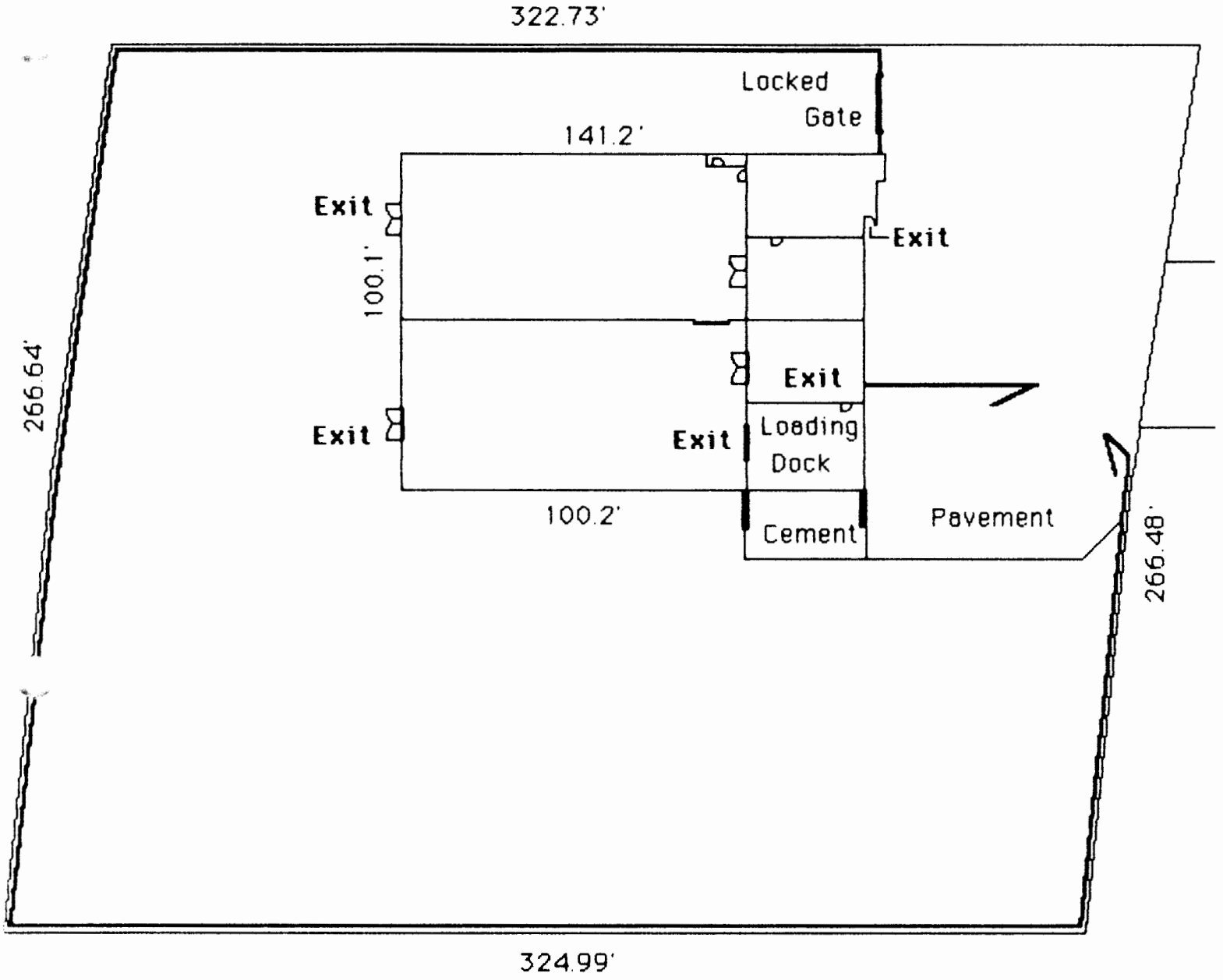
 - Six Fire Extiguishers

 - Five Shower Eyewash Stations

 - Two Pull Stations

 - One Hazardous Waste Spill Pack

 - One First Aid Station




FACILITY DIAGRAM

C.3 REVIEW OF SAFETY EQUIPMENT

Lesson #3

Purpose: To acquaint the trainee with the existance and use of the different safety equipment found at the Rinchem Company facility.

Topics Discussed:

I. Hazards That Can be Faced
   A. Toxic Substances
   B. Corrosive Materials
   C. Flammable Agents
   D. Cancer-Causing Agents
   E. Accidents Resulting in Physical Harm

II. Exposure
   A. Ways to be Exposed
      1. Inhalation
      2. Skin
      3. Ingestion
   B. Health Problems Caused by Exposure
      1. Asphyxiation
      2. Cancer
      3. Poisoning
      4. Eye Injuries
      5. Skin Diseases
      6. Loss of Limbs, etc.

III. Personal Protective Equipment

A. Know Advantages and Disadvantages of Equipment

B. Use Equipment as Instructed

C. Protective Clothing

1. Gloves
2. Boots
3. Aprons
4. Goggles
5. Jackets
6. Leggings
7. Hoods
8. Coveralls

D. Respirators

1. Air-Purifying Respirators

(Include a Physical Demonstration)

a. Filtering purifiers to remove dusts, mists, and fumes.

b. Sorbent purifiers to remove gases and vapors.

c. Color-coordinated cannisters for respirators

2. Air-Supplying Respirators (SCBA)

(Include a Physical Demonstration)

IV. Mechanical Equipment Safety

A. Never Walk Under Suspended Loads

B. Be Sure all Machine Guards are in Place

C. Always Keep Loose Clothing Away From Moving Parts

D. Always Use Equipment at Their Recommended Speeds and for Jobs They Were Designed to do.

TEST: LESSON NO. 3

Instructor _____ Date _____

Employee's Name _____ Grade _____

Job Specification _____

1. Name four hazards that are faced when handling hazardous wastes and chemicals.

2. Name three ways that chemicals can enter the body.

3. Name five health problems that could come from exposure to hazardous material.

4. Name the two general classes of respirators?

5. When should each type of respirator be used?

6. Why are the respirator canisters color-coded?

7. Name six pieces of clothing that are given to each employee as protective clothing.

8. Name the two types of air-purifying respirators and discuss usefulness of each type.

9. Name three things that should always be considered while using mechanical equipment.

C.4 CHEMICAL AND HAZARDOUS WASTE CHARACTERISTICS

Lesson #4

Purpose: To understand terminology and how our exposures compare with these limits as well as having a good working knowledge of the basic hazards associated with the different classes of chemicals in use.

Topics Discussed:

I. Threshold Limit Values
   A. Definition
   B. Basis
      1. Industrial Experience
      2. Experimental Human and Animal Studies
   C. Sample Calculation of Time Weighted Average

II. General Classifications of Hazardous Wastes and/or Chemicals
   A. Corrosive
      1. Definition of Corrosive
      2. Definition of Acid
         a. Examples
      3. Definition of Base
         a. Examples
      4. Acids and Bases React Violently When Mixed
      5. pH
         a. Definition
         b. Test Method for pH

c. pH values for common substances

6. Physical Dangers
    a. Primary Concern
    b. Secondary Concern
7. First Aid Treatment
8. Special Characteristics of Certain Corrosives
    a. Hydrogen fluoride
    b. Sulfuric acid
    c. Nitric acid
    d. Phosphorous oxychloride
    e. Boron tribromide

B. Solvents

1. Definition
2. Physical Dangers
    a. Very volatile
    b. Strong odor aspect
    c. Absorption through skin
    d. Inhalation danger (narcotic effects)
    e. Sensitizer and Dermatitis (defatting)
    f. Splashing hazard to eyes
3. Corrosives and Solvents React Violently when Mixed
4. Flammability
    a. Vapors heavier than air
    b. Upper and lower explosive limit concept
5. Flashpoint
6. First-Aid Treatment
7. Special Characteristics of Selected Solvents

TEST: LESSON NO. 4

Instructor _____ Date _____

Employee's Name _____ Grade _____

Job Specification _____

1. A "corrosive" chemical can be:

   (a) Only an acid (b) Only a base

   (c) An acid or base (d) Only a solvent

2. The pH of a strong acid would be:

   (a) 1 (b) 7 (c) 14 (d) None of the above

3. The pH of a strong base (or alkali) would be:

   (a) 1 (b) 7 (c) 14 (d) None of the above

4. Water has a neutral pH of:

   (a) 0 (b) 7 (c) 10 (d) None of the above

5. What is NOT a physical danger associated with handling of a corrosive?

   (a) Skin contact burns (b) Inhalation burns

   (b) Narcotic effects (d) None of the above

6. Phosphorous oxychloride ($POCl_3$) is:

   (a) Not corrosive (b) Corrosive (c) Solvent (d) Neutral

7. Proper first aid for corrosive burns on the skin is:

   (a) Rinse with running hot water for 5 minutes

   (b) Rinse with alcohol sponge for 5 minutes

   (c) Rinse with cold water for 15 minutes

8. First aid for corrosive burns on the eyes is:

   (a) Rinse with running cold water for 15 minutes

   (b) Rinse with eye drops

(c) Rinse with running cold water for 5 minutes

9. After rinsing the corrosive burn, the next step is to:

(a) See doctor within 48 hours (b) Drink plenty of fluids

(c) Go home (d) Get medical attention immediately

10. Oxygen is a:

(a) Nonflammable gas (b) Non toxic gas

(c) Oxidizer (d) All of the above

11. Corrosives should be stored:

(a) Away from flammables (b) In a cool, dry place

(c) Out of the sun (d) All of the above

12. The acid that causes a painful burn several hours after contact is:

(a) Sulfuric acid (b) Hydroflouric acid

(c) Acetic acid (d) Nitric Acid

13. Which of the following combination of hazardous chemicals will react violently when mixed:

(a) Corrosives and solvents (b) Acids and bases

(c) Acids and solvents (d) All of the above

14. Solvent vapors are:

(a) Heavier than air (b) Lighter than air

(c) Non-toxic (d) None of the above

15. An example of a strong base would be:

(a) Hydrogen peroxide (b) Ammonium hydroxide

(b) Ethylene glycol (d) Aqua regia

16. An oxidizer is:

(a) A substance that requires oxygen

(b) A substance that yields oxygen upon decomposition

(c) A substance that combines with hydrogen to produce water C.4

C.5 EMERGENCY RESPONSE IN EVENT OF FIRE OR EXPLOSION

Lesson #5

Purpose: To introduce the trainee to the procedures found in the Contingency Plan that should be followed in the event or a fire and/or explosion.

Topics Discussed:

I. Three types of fire
   A. Wood fire is classified as combustible
      1. Water is used to quench fire or dry powder chemical
   B. A chemical fire is caused from vapor air mixtures over flammable liquids igniting.
      1. Dry chemical powder is used to control fire.
      2. Water is used only to cool containers to prevent explosion.
      3. Chemical foam keeps oxygen out to smother fire.
   C. Electrical fire usually start through short circuiting or overload on line, etc.
      1. Only non-conductive dry chemicals or carbon dioxide is used to control fire.

II. Flammable Liquids: The Four Characteristics
   A. Fire Point - lowest temperature that a vapor will ignite
   B. Flash Point - lowest temperature that liquid gives off enough vapors to ignite
   C. Ignition Temperature - temperature that a flammable vapor

air mix will burn without ignition.

D. Flammable or Explosive Range - range between the smallest and largest amount of vapor that will burn when ignited.

III. Elements for Fire

A. Heat

B. Fuel

C. Oxygen

IV. Effective Fire Prevention

A. Knowledgeable Personnel

B. Correct and sufficient Amount of Fire Fighting Equipment

V. Instructions

A. Show the proper way to use the dry powder extinguishers.

B. Take action as described in Contingency Plan in the event of a fire.

C. Show how and when to use intercom and alarm system for emergency.

D. Discuss who to call. Coordinator, Fire Department?

E. Discuss how to identify characteristics of fire and type and danger involved.

F. Discuss how to tell what is involved in the fire. Drums?

G. Discuss how to tell whether fire is controllable or not.

H. Discuss evacuation plan in the case of fire.

I. Discuss what to do if you have a victim.

VII. Emergency Coordinator

A. Explain who is the coordinator.

B. Discuss the coordinator's responsibilities

TEST: LESSON NO. 5

Instructor _____ Date _____

Employee's Name _____ Grade _____

Job Specification _____

1. Name three types of fires?

2. Name three kinds of agents used to fight fires?

3. What kind of fire is each used for?

4. Explain the difference between a controllable fire and an uncontrollable fire.

5. Where are the emergency phone numbers listed?

6. Who is the Emergency Coordinator?

7. Name three kinds of fire fighting equipment.

8. What is the procedure for giving an alarm?

9. What is the definition of a fire point?

10. What is the definition of a flammable or explosive range for a chemical?

C.6 EMERGENCY RESPONSE IN EVENT OF HAZARDOUS WASTE SPILL

Lesson #6

Purpose: To introduce the trainees to the procedures found in the Contingency Plan that should be followed in the event of a hazardous waste spill.

Topics Discussed:

I. SPILPAC
   A. Location
   B. Contents
      1. Tyvex suits
      2. Goggles
      3. Face Shield
      4. Boot shields
      5. Vermiculite
      6. Plastic
      7. Shovel
      8. Broom
      9. Soda Ash
      10. Oversize Pack Drum
      11. Duct Tape
      12. Labels and manifests

II. Emergency Procedure for the Rinchem Facility
   A. Identification of the Character of the Spill
   B. Identification of the Source and Amount

C. Notification of Emergency Coordinator

D. Fire Protection for Possible Ignition

E. No Vehicle Near Spill

F. Necessary Reporting of Spill

III. Hazardous Waste in Transit

A. Required Actions

1. Actions Needed to Protect Human Health and Environment

   a. Stay on scene with vehicle

2. Necessary Warning Signs for Traffic

   a. Use of smoke and/or flares is not advisable

3. Notification of Local Authorities

4. Notification of National Response Center

5. Dike Area if Necessary to Prevent Run-Off

6. Cooperation with Local Authorities

7. Chem Trec

8. Reporting of Hazardous Waste Spill

TEST: LESSON NO. 6

Instructor _____ Date _____

Employee's Name _____ Grade _____

Job Specification _____

1. Name the Emergency Coordinator.

2. Name six items found in the SPILPAC that can be used to clean up a hazardous waste spill.

3. What size of spill must be reported?

4. Approximately how much liquid can a bag of absorbent soak up?

5. What is the most important thing to remember is case of a spill or release of hazardous waste?

6. What is Chem Trec?

7. Why is soda ash stored in the SPILPAC?

8. What should be done with any soil contaminated with hazardous waste?

9. What can be done to identify the wastes involved in a hazardous waste spill?

## C.7 FEDERAL AND STATE RULES AND REGULATIONS FOR THE GENERATION, TRANSPORTATION, TREATMENT, STORAGE, OR DISPOSAL OF HAZARDOUS WASTE

Lesson #7

Purpose: To introduce the trainee to all the regulations that govern the generation and overall handling of hazardous waste.

Topics Discussed:

I. Government Agencies and Laws
   A. R.C.R.A.
      1. Reason for Existence
   B. E.P.A.
      1. Reason for Existence
      2. Cradle to Grave System
         a. Generator
            (i) Amount necessary to be considered a generator
         b. Transporter
         c. Storage facility
            (i) Time requirement
            (ii) Part A permit application
            (iii) Part B permit application
         d. Treating or disposal facility
         e. Identification numbers
         f. Manifesting
         g. Record keeping
         h. Regulations

3. Characteristics of Hazardous Waste
    a. Definition
    b. List of hazardous wastes
    c. Hazardous waste numbers
    d. Toxicity
        (i) Definition
        (ii) Acutely toxic
            (a) Definition
    e. Ignitability
        1. Definition
    f. Corrosivity
        1. Definition
    g. Reactivity
        1. Definition
4. Possible Fines

C. D.O.T.
    1. Reason for Existence
    2. Container Regulations

D. E.I.D.
    1. Reason for Existence
    2. Added State Regulations

TEST: LESSON NO. 7

Instructor _____ Date _____

Employee's Name _____ Grade_____

Job Specification _____

1. Who is E.P.A. and what is its function?

2. Who is D.O.T. and what is its function?

3. Explain the cradle to grave process.

4. What is T.S.D. and what denotes a T.S.D. facility?

5. How long can hazardous waste be stored without being a storage facility?

6. Give the definition of hazardous waste?

7. Name the four characteristics of a hazardous waste.

8. When do you become a generator?

9. When is a manifest necessary?

C.8 MANIFESTING OF A HAZARDOUS WASTE

Lesson #8

Purpose: To acquaint the trainee with the reason and procedures used in manifesting hazardous waste.

(Note: Have an example manifest that can be filled out during this training section)

Topics Discussed:

I. Cradle to Grave System in Detail
   A. All Shipments Must Have a Manifest
      1. Small Generators Have No I.D. Number but Still Must Have Manifest
      2. Time Limit for Storage by Generators
   B. Manifest
      1. Demonstration of How a Manifest Should be Completed
      2. Person Who Fills Out Manifest
         a. Entire manifest completed
         b. Writing should be legible
      3. Person Who Signs Manifest
         a. Signature should be full name not initials
      4. Copies
         a. One copy to T.S.D. facility
         b. One copy to transporter from T.S.D.F.
         c. One copy to generator from T.S.D.F.
         d. One copy generator keeps

5. Manifest is a Shipping Document
6. Manifest is Needed for Each Waste Stream
7. Empty Drums are not Shipped With a Manifest

II. Procedures for Waste Drums

A. Hazardous Waste Labels that Must be on Each Drum.

B. Previous Existing D.O.T. Rules and Regulations Regarding Specified Containers and Correct Labeling.

C. Hazardous Waste Drums Filled to not More than 97% of Capacity to Allow for Expansion

III. Problems with Shipment

A. Reasons for Rejection of Shipment

1. Wrong Count
2. Wrong Label
3. Leakers
4. Bulged Tops or Bottoms
5. Contains Other Material

B. Do not Change Manifest

1. Manifest Only Changed by Responsible Party Who Signed it.
2. Changes are Initialed.

TEST: LESSON NO. 8

Instructor _____ Date _____

Employee's Name _____ Grade_____

Job Specification _____

1. What is the reason for a manifest?

2. When do you use a manifest?

3. How many copies are needed?

4. How are they distributed?

5. Can you leave some areas blank if you do not understand?

6. Is is all right to abbreviate e.g. M.E.K. , I.P.A. ?

7. Is the manifest acceptable as a shipping document?

8. Must a transporter always take the hazardous waste to the T.S.D. facility designated on the manifest? Why?

9. How long can you store hazardous waste as a transporter without being a storage facility?

10. Are manifests different in different states?

TEST: LESSON NO. 8 (page 2)

Instructor _____ Date _____

Employee's Name _____ Grade_____

Job Specification _____

At the close of the question and answer session, a blank copy of a manifest will be given to each student in the class. The student must fill in correctly the manifest using the example given and the information therein. These manifests will be graded for accuracy and recorded.

Manifest the following example:

20 drums of hazardous waste lacquer thinner

Component % approximately:

30% - Methyl Ethyl Ketone

20% - Toluene

16% - Paint Sludge

4% - Water

4% - Acetates

14% - ketones

6% - Aromatics

6% - Esters

For ficticious names, use John Smith, Mary Smith, etc.

C.9 LABELING OF HAZARDOUS WASTE AND TRANSPORTATION OF WASTE

Lesson #9

Purpose: To introduce the trainee to the proper procedures needed to label waste drums as well as the procedures used to transport waste drums.

Topics Discussed:

I. E.P.A. and D.O.T. Pretransportation Regulations

(Note: The actual sections found in the federal regulations were covered as well as state regulations which may conflict with federal regulations. When state and federal regulations come in conflict, the most stringent rule shall apply.)

A. CFR 40 - Pretransportation Requirements E.P.A. & D.O.T. Regulations

1. Packaging (262.30 CFR 40; CFR 49, Sec. 173.178.179)
2. Labeling (262.31 CFR 40; CFR 49, Sec. 172.334)
3. Marking (262.32 CFR 40; CFR 49, Sec. 172.101)
4. Placarding (262.33 CFR 40; CFR 49, Sec. 172.504)
5. Accumulation Time (262.34 CFR 40)
6. Leaking Package (265.173 CFR 40; CFR 49, Sec. 177.854)
7. Compatibility in Storage (262.177 CFR 40)
8. Hazardous Waste Label (261.6 CFR 40)

II. Transportation Regulations

A. D. O. T. Regulations

1. Qualifications for Driving Part 391 Federal Motor Carrier

Safety Regulations

2. Maximum Driving Time and On Duty Time Part 395, FMC
3. Driver's Daily Log Part 395.8, FMC

B. Safety Practices

1. Responsibilities
2. Alcoholic Beverages, Drugs, Part 391.41, FMC
3. Driving While Ill or Fatigued Part 392.3, FMC

C. Fire Prevention

1. Fueling Precautions, Part 392.50, FMC
2. Extinguisher Capacity

D. Safe Driving

1. Loading
2. Product Drum-off
3. Customer Relations
4. Accident Part 394.9, CFR

E. Vehicle Inspection

1. Maintenance
2. Inspections
3. Repairs

F. Driver Instruction

1. Supply of Hazardous Waste Labels
2. Waste Pick-up Only in D. O. T. Approved Drums
3. Waste Shipment Inspection Sheet

TEST: LESSON NO. 9

Instructor _____ Date _____

Employee's Name _____ Grade_____

Job Specification _____

1. What kind of D.O.T. container is needed for shipping 55 gallons of waste methyl ethyl ketone?

2. What kind of a D.O.T. container would you use if shipping 55 gallons of waste acetone?

3. What is the E.P.A.'s definition of an empty container?

4. How long must a generator keep a drum of hazardous waste before shipping? Why?

5. Write a proper shipping name for a mixture of hazardous waste e.g. 20% acetone, 40% mineral spirits, 40% kerosene.

6. Where can a vehicle placarded "flammable" park legally?

7. Where are the shipping papers kept while in transit?

C.10 SPECIFIC PERMIT REGULATIONS

Lesson #10

Purpose: To acquaint the trainee with the specific requirements of the permit that has been approved by the State of New Mexico.

Topics Discussed:

I. Part A Permit Requirements
   A. Interim Status Storage Facilities
   B. Items included in Part A Application

II. Part B Permit Requirements
   A. Facility Description
      1. Facility Location
         a. Political Jurisdiction
         b. Seismic Compliance
         c. 100-Year Floodplain Location
      2. Topographic Map
         a. Topography of land
         b. Land use
         c. Wind rose data
         d. Access to facility
      2. Traffic
         a. Safe traffic practices
      3. Preventive Procedures, Structures, and Equipment
         a. Preparedness and prevention

b. General hazard prevention

c. Prevention of ignition of reaction of wastes

B. Security

1. Access to facility

2. Danger Signs

C. Inspection

1. Pre-Acceptance Inspections

2. Weekly Inspections

3. Quarterly Inspections

4. Semiannual Inspections

D. Waste Analysis

1. Pre-acceptance Procedures

a. Waste analysis profile sheet

b. Initial sample waste analysis

c. Sampling procedures

2. Incoming Shipment Procedures

a. Fingerprint analysis

b. Sampling Procedures

3. Storage Procedures

4. Quality Control Program

E. Training

1. Job Descriptions

2. Initial Training

3. Annual Review

F. Contingency Plan

1. Emergency Coordinator

2. Procedures Used in the Event of a Hazardous Waste Spill

3. Procedures Used in the Event of a Fire and/or Explosion
4. Procedures used in the Event of a Tornado and/or Flood
5. Agreements with Local Authorities

F. Closure
1. Closure Plan
a. Time Requirement
b. Amount of Waste Involved
2. Closure Cost Estimate/Financial Assurance Mechanism
3. Liability Requirements

G. Containers
1. Compatibility Between Drums and Hazardous Waste

III. Recordkeeping

A. Company Policies
1. Waste Analysis Plan
2. Contingency Plan
3. Hazardous Waste Permit

B. Other Filed Information
1. Training Records
2. Waste Analysis
a. Initial waste analysis for each stream
b. Fingerprint waste analysis for each stream
3. Inspection Records
4. Manifests of Waste Shipments

C. Length of Time Records are Kept

TEST: LESSON NO. 10

Instructor _____ Date _____

Employee's Name _____ Grade_____

Job Specification _____

1. Why does Rinchem facility need a storage permit for hazardous waste?

2. What type of instrument is used to sample wastes stored in drums?

3. Name three characteristics that are tested for in the fingerprint analysis of an incoming waste shipment?

4. Why is it important to know if Rinchem facility is in a 100 year floodplain?

5. Why is it important to check if the facility is near any recent geologic fault?

6. How long are important records kept at the Rinchem facility?

7. Name the types of hazardous waste stored at the Rinchem facility?

C.11 HANDLING PROCEDURES; INSPECTION OF HAZARDOUS WASTE

Lesson #11

Purpose: To introduce the trainee to the procedures used in safe handling of hazardous waste as well as the inspection procedures to insure that the hazardous waste is stored properly and safely.

Topics Discussed:

I. Pre-Acceptance Inspection
   A. Manifest is in Order
   B. Labels on Drums Match Information on Manifest
   C. Discrepency in Number of Drums
   D. Condition of Drums
      1. Severe Corrosion
      2. Bulging Drums
      3. Leaks
      4. Open Drums

II. Facility Inspections
   A. Weekly Inspections
      1. Container Unloading/Loading Area
      2. Container Storage Area
      3. Stored Container
      4. Security Equipment
         a. Locks
         b. Gates

5. Fire Extinguishers
6. Forklift

B. Quarterly Inspection
   1. Container Unloading/Loading Area
   2. Container Storage Area
   3. Security Equipment
      a. Gates
      b. Facility fence
      c. Signs
      d. Lighting
   4. Safety Equipment
      a. Emergency shower/eyewash
      b. Face shields
      c. Protective glasses
      d. First Aid stations
      e. Protective clothing
      f. Chemical respirators
   5. Emergency Equipment
      a. Fire extinguishers
      b. Emergency lights
      c. Absorbants
      d. Containment booms
      e. S.C.B.A.
      f. SPILPAC
   6. Monitoring System

C. Semiannual Inspection
   1. Ground Monitoring System

TEST: LESSON NO. 11

Instructor _____ Date _____

Employee's Name _____ Grade_____

Job Specification _____

1. Name the four types of inspection sheets used at the Rinchem Company facility.

2. When is a Pre-Acceptance Inspection Sheet filled out?

3. Name four things that are inspected on the Pre-Acceptance Inspection Sheet.

4. How often is the First Aid Station inspected and what is it inspected for?

5. Why is routine inspection so important?

6. How often should the storage area be inspected for leakers?

7. How often is the ground water well inspected and for what three characteristics of the ground water?

8. How long should the inspection records be kept at the Rinchem facility?

C.12 RINCHEM COMPANY INC. WASTE ANALYSIS PLAN

Lesson #12

Purpose: To introduce the trainee to the analysis that is described in the Rinchem Company Waste Analysis Plan and to the procedures that are used at Rinchem to sample incoming waste shipments.

Topics Discussed:

I. Waste Analysis Plan
   A. Pre-acceptance Procedures
      1. Generator Requirements
         a. Waste profile sheet
         b. Representative sample
         c. Certificate of representative sample
      2. Frequency of Analysis
         a. Routine basis
         b. Contingency basis
      3. Waste Analysis Parameters and Rationale for Selection
         a. Physical description
         b. pH screening
         c. Specific gravity
         d. Ignitability screen
         e. Assay
      4. Test Methods for Analyzing Parameters
      5. Procedures for Collecting Representative Sampling
         a. Description of sampling device
         b. Personnel safety precautions

c. Sampling procedures for drums

6. Waste Analysis Procedures and Methods for Waste Ignitability, Reactivity, or Incompatibility

B. Incoming Load Procedures

1. Consistency Between Waste and Manifest
2. Fingerprint Waste Analysis Parameters
   a. pH screening
   b. Specific gravity
   c. Physical description
3. Tolerance Levels for Fingerprint Analysis
   a. Quantitative
   b. Qualitative
4. Procedures for Collecting Representative Samples
   a. Cube Root Equation
   b. Random Sampling
5. Procedures for Rejecting Shipments of Waste
   a. Reevaluation

C. Storage

1. Proper Location
2. Procedures for the clean-up of spills

D. Quality Control

1. Purpose
2. Sampling
3. Analysis

TEST: LESSON NO. 12

Instructor _____ Date _____

Employee's Name _____ Grade_____

Job Specification _____

1. What is a Waste Analysis Plan?

2. Name five waste analysis paramters that are analyzed in the initial waste analysis of a waste stream.

3. What is a Waste Profile Sheet and when should it be filled out?

4. How often should a waste stream be reanalyzed?

5. What fingerprint analysis parameters are used at Rinchem?

6. What instrument is used to sample drums? Describe it.

7. How many drums should be sampled in an incoming shipment?

8. Why is it important to get a representative sample?

9. When are supplemental analysis used?

10. What types of waste streams are accepted at the Rinchem facility?

# Appendix C

# Contingency Plan

# APPENDIX C.

# CONTINGENCY PLAN

# RINCHEM COMPANY

# EMERGENCY CONTINGENCY PLAN

# RINCHEM CONTINGENCY PLAN

## TABLE OF CONTENTS

## RINCHEM CONTINGENCY PLAN

## TABLE OF CONTENTS (cont.)

# A. Introduction

## A.1 Purpose

The purpose of the Contingency Plan is to minimize hazards to human life and the natural environment that may arise in an emergency situation at the Rinchem facility. The provisions of the Contingency Plan are to be carried out by facility personnel immediately when an emergency occurs; whether it be a fire, an explosion, or a release of hazardous material. Any releases of hazardous waste constituents to air, soil or surface water that may be deemed as a possible threat to human health will be considered an emergency situation that will require implementation of the Contingency Plan.

## A.2 Types of Potential Emergencies

The potential for an emergency exists at this facility due to its activities and the types of materials handled. Additionally, natural events could create emergency situations, which must be managed appropriately and effectively. Such events potentially could trigger implementation of the Contingency Plan.

### A.2.1 Emergencies Inherent to Industrial Facility Operations

Potential emergencies that may result from any industrial facility operation include:

(1) Fire

(a) could cause the release of toxic fumes,

(b) could spread and possibly ignite materials at other locations onsite, or cause heat-induced explosions, or

(c) could produce contaminated runoff from controlling fire with water or chemical suppressants.

(2) Explosion

(a) could cause a safety hazard from flying fragments or shock waves,

(b) could ignite other hazardous wastes stored at the facility, or

(c) could result in a release of toxic material.

(3) Hazardous Waste Spill

(a) could release toxic fume,

(b) could ignite itself and/or other onsite wastes , or

(c) could contaminate the environment.

(4) Bomb Threat

(a) could cause the release of toxic fumes, or

(b) could ignite materials at locations onsite, or cause heat-induced explosions of hazardous chemicals.

A.2.2 Natural Events

Certain natural events could cause emergencies at the Rinchem facility which would necessitate the implementation of the Contingency Plan. A flood could cause the contamination of surface and groundwater with hazardous waste. In addition, comingling of

incompatible wastes could be possible in a serious flood. A tornado could cause contamination of the environment as well. In addition, waste could be ignited in an emergency caused by a tornado.

B. Implementation of Response Procedures

B.1 Incident Assessment and Decision Process

In case of an imminent or actual emergency situation, the individual observing the incident will use the intercom system (or make contact in-person) to notify Rinchem's Emergency Coordinator, or his alternate, of the location, nature, and extent of the incident.

The Emergency Coordinator will set up a command post and take control of the affected area, including the commitment of any necessary resources until the emergency has been eliminated and warranted clean-up or restoration is completed.

The Emergency Coordinator will direct the following activities:

(1) Where applicable, see that operations are stopped and that any released waste is contained and collected.

(2) Determine the source, extent of the spilled materials, and assess the primary and secondary hazards. The Emergency Coordinator will determine that the Contingency Plan, in its entirety or in part, should be implemented.

(3) See that any materials spilled in the incident area are isolated from incompatible materials/wastes and ignition

sources.

B.2 Implementation of the Contingency Plan

When a decision has been made to implement the Contingency Plan, the Emergency Coordinator will direct the following procedures:

(1) Initiation of containment and control procedures as described in the Detailed Emergency Procedures section (page 7)

(2) An accounting of all facility personnel/visitors by head count

(3) Implementation of facility notification

(4) Notification of authorities, including requests for assistance, as necessary

(5) Coordination of first aid activities, if casualties are involved, and activation of the casualty control procedures found in the First Aid section (page 18)

(6) Evacuation, if required, and activation of the Evacuation Plan described in a following section (page 15).

C. Emergency Coordinator

The Emergency Coordinator or his alternate will always be "on-call" and can be reached via telephone. The Emergency Coordinator or his alternate arrange their schedules such that one of them can be reached any day of the year, 24 hours per day. In the event both of them will be out of reach on the same day, a surrogate

sources.

B.2 Implementation of the Contingency Plan

When a decision has been made to implement the Contingency Plan, the Emergency Coordinator will direct the following procedures:

(1) Initiation of containment and control procedures as described in the Detailed Emergency Procedures section (page 6) 7

(2) An accounting of all facility personnel/visitors by head count

(3) Implementation of facility notification

(4) Notification of authorities, including requests for assistance, as necessary

(5) Coordination of first aid activities, if casualties are involved, and activation of the casualty control procedures found in the First Aid section (page 17)

(6) Evacuation, if required, and activiation of the Evacuation Plan described in a following section (page 14).

C. Emergency Coordinator

The Emergency Coordinator or his alternate will always be "on-call" and can be reached via telephone. The Emergency Coordinator or his alternate arrange their schedules such that one of them can be reached any day of the year, 24 hours per day. In the event both of them will be out of reach on the same day, a surrogate



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is designated for the period of absence. Table CP-1 shows the Emergency Coordinator and his alternates (following page). The alternates are shown in order of priority.

Table CP-1. Emergency Coordinator List

| Emergency Coordinator | Address | Phone Number |
|---|---|---|
| Mr. Tim Kimball<br>Hazardous Waste<br>Management Coordinator | P.O. Box 1223<br>Corrales, N.M.<br>87048 | (505) 897-7537 H<br>(505) 345-3655 W |
| Mr. Charles Smith<br>Customer Service<br>Supervisor<br>(First Alternate) | 1240 C Nakomis NE<br>Albuquerque, N.M.<br>87112 | (505) 292-7540 H<br>(505) 345-3655 W |
| Mr. William Moore<br>President<br>(Second Alternate) | 4752 Oahu Dr. NE<br>Albuquerque, N.M.<br>87111 | (505) 292-2572 H<br>(505) 345-3655 W |

In the absence of all three, the senior employee on site is designated alternate coordinator until arrival of designated individual.

C.1 Emergency Coordinator Qualifications

Tim Kimball, the Hazardous Waste Management Coordinator, is the Emergency Coordinator at the Rinchem facility. He has the authority to take any necessary actions in an emergency. He has a good knowledge of the Contingency Plan and emergency procedures that are found in the plan. He knows about the safety equipment and communication devices that are found in the facility. He has a good knowledge of all the chemicals that are stored at the Rinchem facility and the hazards that accompany each chemical. The Emergency Coordinator has the qualifications necessary to be in charge in the event of an emergency.

D. Emergency Telephone Numbers

The necessary telephone numbers that would be needed in an emergency are included in this section. The Emergency Coordinator will be responsible for the following notifications if necessary. Table CP - 2 is a list of these telephone numbers.

Table CP-2. Emergency Telephone Numbers

| Agency | Phone Number |
|---|---|
| Bernalillo County Fire Distrct 9 | 344-9914 |
| State Emergency Response Team | 827-9329 |
| Albuquerque Ambulance Service | 765-1100 |

| | |
|---|---|
| Heights General Hospital | 888-7800 |
| Bernalillo County Sheriff's Office | 768-4160 |
| Chemtrec | (800) 424-9300 |
| Poison Control Center | 843-2551 |

E. Detailed Emergency Procedures

The potential incidents which are of highest priority for emergency planning at this facility are (1) fire and/or explosion, and (2) spills or material releases. Other disasters such as tornados, earthquakes, or floods, would be handled in similar response manners as outlined in the Contingency Plan as deemed appropriate by the Emergency Coordinator.

E.1 Fire and/or Explosion

The most probable cause for evacuation of the premises of this facility is fire and/or explosion. It is important that all employees never forget that firefighting requires professional action. The facility will follow this procedure:

(1) Once a fire breaks out, supervisory personnel must be alerted and given the following information:
   (a) Name of reporting person
   (b) Location of fire
   (c) Necessity of fire truck, ambulance, police, or any other emergency vehicle or equipment. These will be called

immediately.

(2) If in the judgement of the Emergency Coordinator, the situation calls for the implementation of the facility Evacuation Plan, he will notify immediately the occupants of the facility by six or more short blasts on the claxton horn, or by voice communication.

(3) Upon notification of evacuation, all personnel with no emergency responsibilities will leave the premises by the nearest safe exit (Refer to Evacuation Plan, page 14). Vehicle and forklift operators will clear their equipment from aisles and exits, if possible, and will make sure all engines and motors are turned off.

(4) The Emergency Coordinator will determine the best method of approach, containment, and control:

(a) Move in from upwind side

(b) Cool all affected containers with flooding quantities of water, as appropriate.

(5) The Emergency Coordinator must make an assessment as to the number of different potential problems or situations which might present themselves in an emergency, and how to deal with them. Consideration must be given to items such as:

(a) Release of fumes and possible necessity for neighbor evacuation

(b) Potential materials which when exposed to fire could explode and result in flying debris which could spread fire to off-site areas or previously unaffected areas at

the facility

(c) Explosions which could result in the release of materials from containers

(d) Residues from firefighting activities which may require to be contained and dealt with in an appropriate manner if deemed hazardous.

(6) All individuals are responsible to familiarize themselves with the content of this plan plus the primary and secondary exits within their work areas, as well as the location of fire extinguishers and first aid kits that may be utilized in case of an emergency. Personnel operating electrical equipment at the time the evacuation notice is given, will be responsible to turn that machine off and if possible, unplug it.

E.2 Chemical Spills

The Emergency Coordinator must make an assessment and take action where necessary to alleviate risk in spill situations. Consideration must be given to potential threats involving hazardous materials and the following procedure must be followed:

(1) Rescue injured, remove to safe area and administer first aid.

(2) If necessary, implement the facility Evacuation Plan.

(3) Activate the emergency reaction procedure to deal with chemical as the situation dictates.

(a) If the spill is a corrisive liquid such as an acid or base, or a non-corrosive liquid such as chlorinated solvents, etc,

absorbent will be used to dike/contain the spill and absorb the material. The corrosives will be neutralized at a later date where the neutralization reaction would not be as dangerous as during an emergency.

(b) If the spill is a solid, clean up the spill and place it in a container.

(c) If the spill is liquid, the secondary storage containment area will hold materials released from drums during storage. Samples of resulting materials released should be taken if there are questions as to the composition or hazard due to multiple container releases.

(d) Liquids collected as a result of a spill and cleanup activities will be pumped from the secondary containment system using pumps, and hoses compatible with the liquids involved.

(e) Liquids collected will be containerized immediately following detection. Containers will be immediately labeled and prepared for storage pending shipment.

(4). Keep four things in mind: (a) control, (b) contain, (c) clean, and (d) communicate.

(5). Keep spectators away from spill.

(6). Do not allow smoking in the area.

(7). Be alert for other ignition sources.

(8). Whenever possible, transform small liquid spill into a solid state and then proceed as if it were a solid.

(9). If necessary, the following agencies must be contacted:

(a) Local officials as applicable

absorbent will be used to dike/contain the spill and absorb the material. The corrosives will be neutralized at a later date where the neutralization reaction would not be as dangerous as during an emergency.

(b) If the spill is a solid, clean up the spill and place it in a container.

(c) In the case of hazardous waste, the secondary storage containment area will hold materials released from drums during storage. Samples of resulting materials released should be taken if there are questions as to the composition or hazard due to multiple container releases. Liquid material will be removed from the secondary tanks , and placed in an appropriate specification drum for the material.

(4). Keep four things in mind: (a) control, (b) contain, (c) clean-up, and (d) communication.

(5). Keep spectators away from spill.

(6). Do not allow smoking in the area.

(7). Be alert for other ignition sources.

(8). Whenever possible, transform small liquid spill into a solid state and then proceed as if it were a solid.

(9). If necessary, the following agencies must be contacted:

(a) Local officials as applicable

(b) State and Federal agencies

(c) Permitted companies to assist with spill containment, clean-up, and disposal, if necessary.

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(b) State and Federal agencies

(c) Permitted companies to assist with spill containment, clean-up, and disposal, if necessary.

E.3 Accident in Transit

Rinchem is a transporter of hazardous waste. An accident in transit involving hazardous waste is an emergency which Rinchem must be prepared for. The following items should be followed in the event of an accident in transit:

(1) In most cases, the State Police or Highway Patrol will be the first to arrive on the scene of an accident and the driver will give them the emergency telephone numbers of those people or agencies whom he wishes to contact.

(2) The driver should stay with his vehicle.

(3) The driver must take whatever action he feels necessary in order to protect human health and the environment.

(4) Keep unnecessary people away; isolate hazard area and deny entry.

(a) If the vehicle is placarded combustible or flammable, the driver must not allow anyone to use road flares or smoke.

(5) Stay upwind; keep out of low areas.

(6) In case of fire:

(a) Use fire extinguishers that are found in the truck.

(b) Move containers from fire area if one can do it without risk.

(c) Cool containers that are exposed to flames with water from the site until well after fire is out.

(d) Withdraw immediately in case of rising sound from venting

E.3 Accident in Transit

Rinchem is a transporter of hazardous waste. An accident in transit involving hazardous waste is an emergency which Rinchem must be prepared for. The following items should be followed in the event of an accident in transit:

(1) In most cases, the State Police or Highway Patrol will be the first to arrive on the scene of an accident and the driver will give them the emergency telephone numbers of those people or agencies whom he wishes to contact.

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(3) The driver must take whatever action he feels necessary in order to protect human health and the environment.

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(5) Stay upwind; keep out of low areas.

(6) In case of fire:

  (a) Use fire extinguishers that are found in the truck.

  (b) Move containers from fire area if one can do it without risk.

  (c) Cool containers that are exposed to flames with water from the site until well after fire is out.

  (d) Withdraw immediately in case of rising sound from venting safety device or any discoloration of tank due to fire.

(7) In case of spill:

  (a) Stop leak if one can do it without risk.

  (b) For small spills, take up with noncombustible absorbent

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safety device or any discoloration of tank due to fire.

(7) In case of spill:

(a) Stop leak if one can do it without risk.

(b) For small spills, take up with noncombustible absorbent material and place in containers for later disposal.

(c) For large spills, dike far ahead of spill for later disposal. This will prevent run-off into drain lines or waterways.

(8) In case of a victim, use casualty procedures found in the First Aid Section of the Contingency Plan (page 19).

(9) If deemed necessary, Chemtrec should be notified.

(10) When the clean-up is finished, the necessary reporting should be done within the alloted time period.

## E.4 Bomb Threat

### E.4.1 The Threat

The telephone call threat. (A high percentage of bombings are preceded by telephone calls.) In the event of a bomb phone call:

(1) If possible secure the following information. (Use check list on attached sheet, Figure CP-1, page 14)

(a) Date and time of call

(b) Any background noise - music, people talking, etc

(c) Location of bomb and the time it is set to go off

(d) What kind of bomb

(e) What kind of package

(f) Judge the voice - drugged or drinking, age, sex, etc.

material and place in containers for later disposal.

(c) For large spills, dike far ahead of spill for later disposal. This will prevent run-off into drain lines or waterways.

(8) In case of a victim, use casualty procedures found in the First Aid Section of the Contingency Plan (page 18).

(9) If deemed necessary, Chemtrec should be notified.

(10) When the clean-up is finished, the necessary reporting should be done within the alloted time period.

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(1) If possible secure the following information. (Use check list on attached sheet, Figure CP-1, page 13)

(a) Date and time of call

(b) Any background noise - music, people talking, etc

(c) Location of bomb and the time it is set to go off

(d) What kind of bomb

(e) What kind of package

(f) Judge the voice - drugged or drinking, age, sex, etc.

(g) Ask for caller's name and address (You might get it.)

(2) These questions will detain the caller so a trace can be made. To trace the call, have another employee call the telephone company on a different line.

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(g) Ask for caller's name and address (You might get it.)

(2) These questions will detain the caller so a trace can be made. To trace the call, have another employee call the telephone company on a different line.

## Bomb Threat Check List

Date Time Your Name

Listen for background noises Describe:

Check if heard:

Music _____

People talking _____

Cars or trucks _____

Airplane _____

Children or babies _____

Machine noise _____

Typing _____

Other _____

Ask:

Where is the bomb? _____

What time is it set to go off? _____

What kind of bomb is it? _____

What kind of package or box? _____

When did you set the bomb? _____

What is your name? _____

Where do you live? _____

How old are you? _____

Judge the Voice: Man ___ Woman ___ Child ___ Age ___ Drinking

Figure CP-1. Bomb Threat Check List

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## Bomb Threat Check List

---

Date Time Your Name

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Listen for background noises Describe:

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Where do you live? _____

How old are you? _____

Judge the Voice: Man ___ Woman ___ Child ___ Age ___ Drinking

Figure CP-1. Bomb Threat Check List

E.4.2 The Search Technique

Do not touch handle, or move any suspicious object. Make a search for suspicious packages, boxes, or objects. Halls and toilets head the list of places. Make the search while waiting for the police to arrive. Have each supervisor responsible for a certain area. A systematic search will eliminate valuable time loss, awaiting police arrival.

Report the findings of anything suspicious to the police. If anything suspicious is found, set up a "Danger Zone" and evacuate all personnel from the facility using the Evacuation Plan (page 16). Remove flammable materials if practical and possible.

E.5 Storm or Floods

In the event of a severe storm (e.g., tornado), all personnel should take shelter in an interior hallway or room, away from windows. No one should remain in the yard or exposed area of the warehouse.

In the case of floods, or, more likely, high water due to rain, the major precaution is to shut off the main power panel. Inventory must be looked to and repositioned as necessary to protect it.

In any kind of severe weather situations, rely on a battery-powered radio for weather advisories.

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In any kind of severe weather situations, rely on a battery-powered radio for weather advisories.

F. Evacuation Plan

The Emergency Coordinator, or his alternate, is the only person authorized to call for complete evacuation of the site in response to an emergency situation, which threatens the health and safety of the facillity personnel. He takes this action based on his analysis of the emergency situation.

The following actions will be taken when the Emergency Coordinator orders a site evacuation:

(1) Each individual will determine which route he or she will take (primary or secondary) depending on the location of the incident, wind direction, and his or her location.

(2) The Emergency Coordinator will broadcast evacuation alarm with six or more short blasts on claxton horn or via voice communication.

(3) All personnel and visitors will immediately leave following the designated evacuation route as instructed. Customer service or administrative employees will calmly but firmly direct visitors off-site. Routes are shown in Figure CP-2 (following page).

(4) In general, evacuation should proceed as follows:

   (a) If downwind of incident, evacuate perpendicularly to wind direction over the most accessible route.

   (b) If upwind of incident, evacuate in the upwind direction.

(5) Personnel will regroup at the intersection of the road easement and Edith Blvd. east of the facility.

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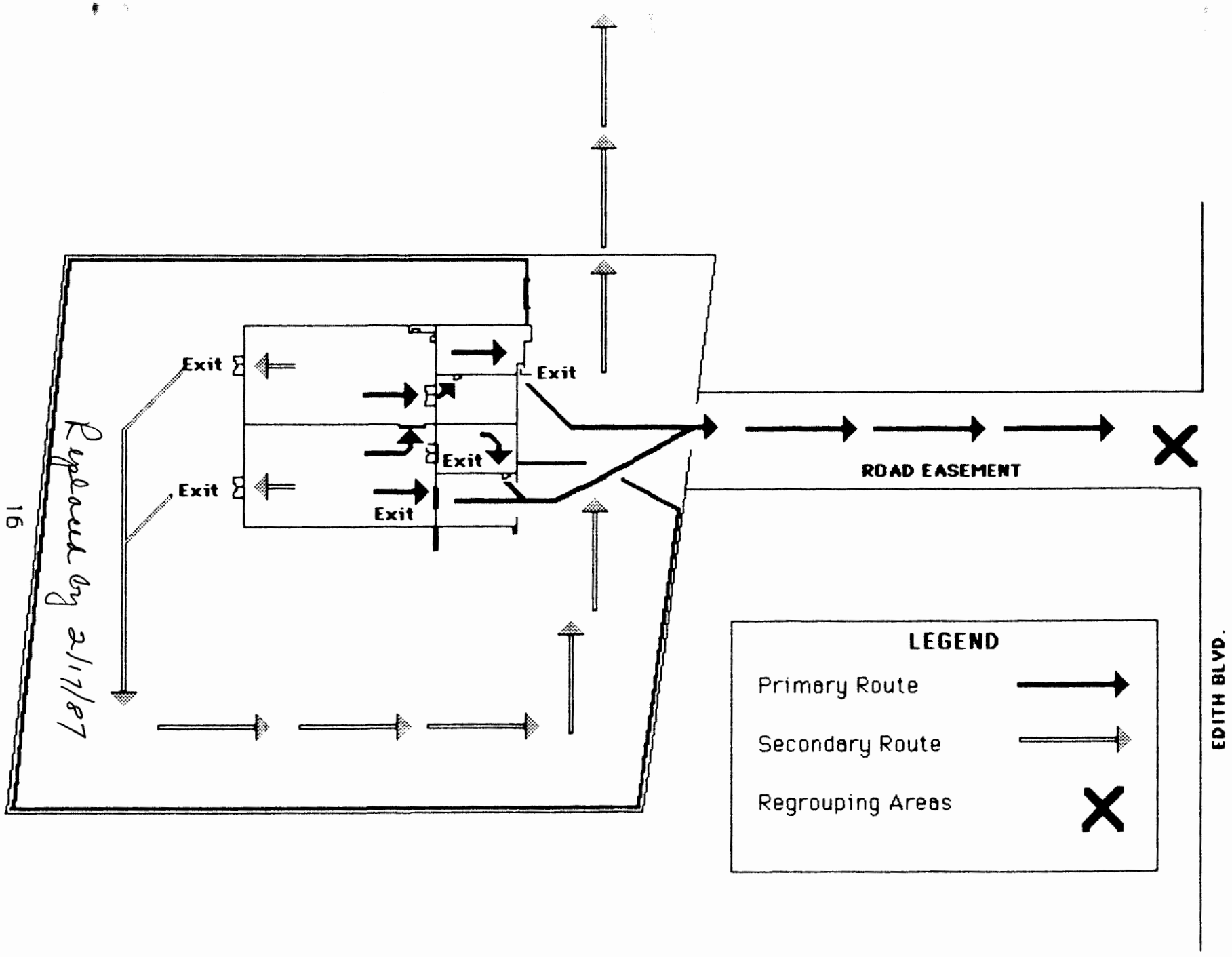


Figure CP-2. Primary and Secondary Evacuation Routes

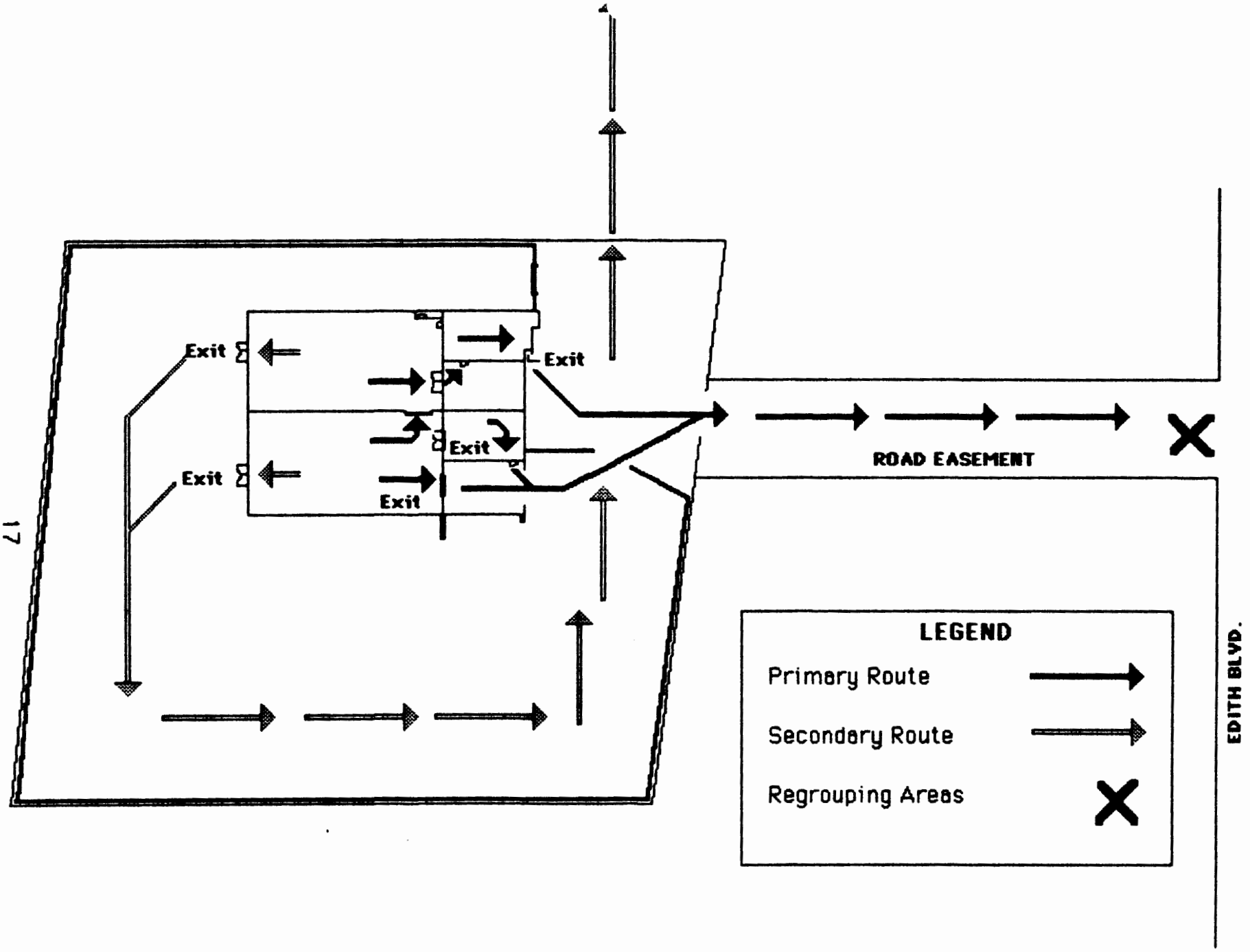


Figure CP-2. Primary and Secondary Evacuation Routes

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(6) A person designated by the Emergency Coordinator will initiate a head count of all the people at the regrouping area. This information will be given to the Emergency Coordinator.

F.1 Community Evacuation

In anticipation of the remote possibility that areas adjacent to or near the site many be endangered, the following items must be considered by the Emergency Coordinator:

(1) The Emergency Coordinator will notify the local authorities of the possible need to evacuate off-site areas. He will indicate the nature, extent, and rate of spead (including direction) of potential hazards to the community.

(2) Prior to local response, facility personnel will initiate roadblocks (if necessary) and evacuation procedures for areas adjacent to the site.

(3) The Emergency Coordinator will maintain communications with local authorities and assist in the coordination of the community evacuation, emergency respose, and casualty control activities.

(4) The Bernalillo County Sheriff's Office will implement its procedures for the evacuation of endangered areas.

F.2 Re-Occupancy of Facility

The determination of when the facility may be re-occupied safetly will be made by the Emergency Coordinator in consultation with responding emergency services agency personnel. Site activities

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G. First Aid

During the course of any emergency, injured individuals will be provided first aid, as appropriate. For more serious injuries, outside medical assistance will be sought. During an emergency situation, the Emergency Coordinator will accomplish the following:

(1) Designate, organize and direct available first-aid personnel.

(2) Access information regarding injury-causing agents, including toxicity and decontamination requirements. If needed, Chemtrec and the Natinal Poison Control may be called on for emergency information.

(3) Assess the situation and summon emergency medical assistance form the Bernalillo Fire Dept. as well as Heights General Hospital. The Emergency Coordinator will meet incoming emergency/medical services and guide them to the first-aid station or location of emergency.

(4) Injured personnel will be placed in the care of qualified medical personnel. The Emergency Coordinator will provide first aid resources to the medical service person in charge.

(5) Assist the medical service in charge by providing notification of the appropriate hospital or emergency room of the arrival of the injured, the nature of the injury, information on toxicity and

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H. Emergency Press Relations

The following is included only as a quick reference in case you must deal with the press.

(1). If the emergency involves a fire, police, or hospital authorities and is likely to be reported in the press, it is usually to the advantage of the company for a single knowledgable representative (usually the senior manager present) to give the press a brief statement of the facts, in order to prevent rumor and distortion .

(2) Spokesmen are cautioned not to speculate or give opinions on cause, cost, or other information relating to the emergency.

(3) In time of disaster, reporters and photographers desiring admittance to an emergency site should be assisted to the extent that it does not conflict with their safety and response to the emergency.

(4) Allow news and TV photographers to take pictures unless it hampers safety, security, or emergency response.

(5) If reporters cannot get facts from a Rinchem representative, they can get at least some of them readily from police, coroner, hospitals and the fire department, agencies they contact constantly. If reporters have to try to pry "facts" from some bystander who more than likely does not know the facts (but

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(6) The wrong answer, or a too-hasty, curt, evasive, or off-the-cuff answer, could do harm to the company and its good reputation with the public.

(7) No answer at all, or a blunt "No Comment" is often the worst possible response. There is a general impression that behind the statement "No Comment" hide the guilty, the frightened, or the intimidated. Politely direct questions to the official company spokesperson.

(8) Experienced reporters know that occasionally there are developments which must be kept confidential for a time. If that is the situation, explain fully and clearly the reason why the answer cannot be give, and assure reporters that they will be informed as soon as information is available.

(9) If reporters want to quote you by name, there is usually no reason why they should not do so.

I. Post-Emergency Procedures

Post-emergency procedures are designed to prevent recurrence, to clean-up and dispose of residuals, to decontaminate equipment, and to debrief personnel. The owner or operator must notify the Regional Administrator, and appropriate State and local authorities that the facility has completed the following items before operations are resumed in the affected area(s) of the facility.

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I.1 Prevention of Recurrence

The Emergency Coordinator will take all necessary steps to ensure that a secondary release, fire, or explosion does not occur after an initial incident. Procedures that will be carried out in the affected area include:

(1) Inspection for any leaks or cracks in pipes, valves, and/or drums.
(2) Inspection for gas generation.
(3) Isolation of residual wastes materials.
(4) Ventilation of building if necessary.

Operations that initially were shut down in response to the incident will not be reactivated until the Emergency Coordinator gives an "all clear" signal.

I.2 Treatment or Disposal of Released Materials and Clean-Up Residues

Once the emergency situation is under control, the Emergency Coordinator will initiate additional clean-up activities, including preparation of any residues for storage or shipment off-site for treatment/disposal. This will occur as soon as possible to avoid further contamination. All such residues will be handled as hazardous until verified as nonhazardous.

Liquid spills occurring within a containment area will be analyzed, removed, and stored securely. Spilled liquids cleaned up

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with absorbents will be placed in drums and sealed. Leaking containers will be segregated immediately and repackaged. No waste that may be incompatible with the released material will be treated, stored, or disposed of until cleanup procedures are completed.

I.3 Equipment Decontamination and Maintenance

All equipment used during the cleanup will be decontaminated and readied for future use. All site personnel will shower and remove contaminated clothing, as necessary. Fire extinguishers will be recharged, personnel protection equipment replaced, and absorbent and neutralizing materials restocked. The operability of pumps and generators will be checked; all other emergency equipment (e.g. ladders, shovels, forklift, ropes, etc.) will be checked and confirmed to be in designated areas. Before operations are resumed, an inspection of all safety and emergency equipment will be conducted.

I.4 Personnel Debriefing and Retraining

The Emergency Coordinator will conduct debriefings of site supervisors, operating personnel, and local authorities to assess preparedness and prevention, response, casualty control, and evacuation procedures, as appropriate. Based on this review, suggestions for revisions to the Contingency Plan will be made to facility management.

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I.3 Equipment Decontamination and Maintenance

All equipment used during the cleanup will be examined and readied for future use. The equipment deemed to be contaminated will be scrubbed using water. The rinsate from this cleaning procedure will be collected in a drum suitable for shipment of hazardous wastes to a disposal site, if necessary. A sample will be collected from each drum of rinsate in accordance with procedures outlined in WAP-A pages 8-11. They will be analyzed in accordance with test methods described in ASTM 505 for TOC, in the event the total organic carbon content is in excess of 50 mg/l, the specific equipment will be recleaned until TOC levels are <50 mg/l.

All site personnel will shower and remove contaminated clothing, as necessary. Fire extinguishers will be recharged, personnel protection equipment replaced, and absorbent and neutralizing materials restocked. The operability of pumps and generators will be checked; all other emergency equipment (e.g. ladders, shovels, forklift, ropes, etc.) will be checked and confirmed to be in designated areas. Before operations are resumed, an inspection of all safety and emergency equipment will be conducted.

J. Arrangements with Local Authorities and Other Resources

Appropriate authorities have toured the facility and noted hazards and layout. A copy of the Contingency Plan is maintained at the facility. Copies will be distributed to:

(1) Bernalillo County Sheriff Department

(2) Bernalillo County Fire Depratment

(3) State of New Mexico: Environmental Improvement Division

(4) U.S. EPA Region VI

(5) Heights General Hospital

K. Outside Notification

The Emergency Coordinator must immediately notify either the government official designated as the on-scene coordinator for Rinchem's geographical area, or the National Response Center. The report must include:

(1) Name and telephone number of reporter;

(2) Name and address of facility;

(3) Time and type of incident ( e.g., release, fire);

(4) Name and quantity of material(s) involved, to the extent known;

(5) The extent of injuries, if any; and

(6) The possible hazards to human health; or the environment, outside the facility.

The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the

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The Emergency Coordinator must immediately notify either the government official designated as the on-scene coordinator for Rinchem's geographical area, or the National Response Center. The report must include:

Contingency Plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:

(1) Name and telephone number of reporter;

(2) Name and address of facility;

(3) Time and type of incident ( e.g., release, fire);

(4) Name and quantity of material(s) involved, to the extent known;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

L. Amendments to the Contingency Plan

The Emergency Coordinator upon discussion with management will be responsible for changing the Emergency Contingency Plan.

This Contingency Plan is subject to review and amendment, if:

(1) The plan fails in an emergency;

(2) The facility's permit is revised;

(3) The facility changes in design, construction, operation, or maintenance; if other circumstances develop that materially increase the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents; or if Rinchem changes in the response necessary for any expected emergency;

(4) The list of Emergency Coordinators changes; or

(5) The list of emergency equipment changes.

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The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the Contingency Plan. Within 15 days after the incident, he must submit a written report on the incident to the Director, EID. The report must include:

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When the Contingency Plan is amended for any reason, each major change is reviewed with appropriate agencies and/or emergency response authorities. Modified Contingency Plan copies will be distributed to local, State and Federal agencies, and to the facility personnel responsible for its implementation.

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Capabilities

| Equipment | Number | Purpose /Capacity | Location |
|---|---|---|---|
| First Aid Station | 1 | First aid medical supplies | Office (Refer to Figure CPA-1, page A-5) |
| EMERGENCY COMMUNICATION AND ALARM SYSTEMS | | | |
| Pull Stations | 2 | Stations are audible and connected to outside monitoring system | Office, Dock (Refer to Figure CPA-1, page A-5) |
| Intercom | 1 | Intercom can be heard in many parts of warehouse | All phones |
| Claxton Horn | 1 | Can be heard throughout warehouse | All phones |

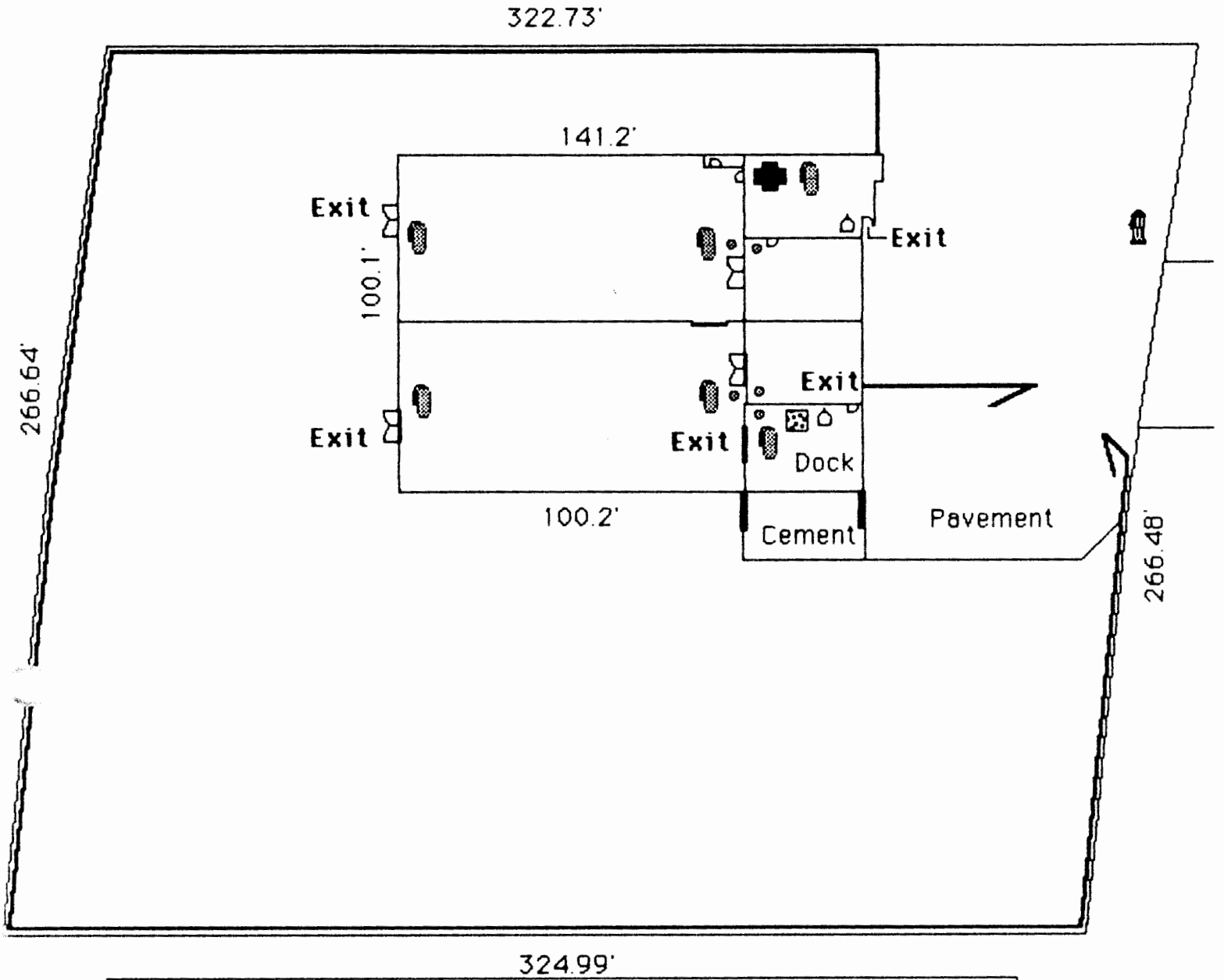


Figure CPA-1. Emergency Equipment

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# APPENDIX CPA.

# EMERGENCY EQUIPMENT LIST

## EQUIPMENT AND VEHICLE INVENTORY

| Equipment | Number | Capabilities Purpose /Capacity | Location |
|---|---|---|---|
| FIRE CONTROL | | | |
| Fire Extinguishers | | | |
| Dry Chemical | 6 | ABC fires | Office, Exits of warehouse rooms, dock (See Figure CPA-1, page A-5) |
| Dry Pipe Water Sprinkler | 1 | Water sprinkler system double fireman's hookup | On roof in both warehouse rooms for foam injection if necessary |
| PERSONNEL PROTECTION | | | |
| Protective Eyeglasses or Goggles | 12 | Protect eyes from vapors or splashes | Office for visitors, Employees keep own glasses. |
| Face Shields | 2 | Protect eyes and face | Safety equipment storage rack |
| Half Face Respirators w/ Cartridges | 2 | Respiratory protection-moderate containment levels | Safety equipment storage rack |

| Equipment | Number | Capabilities<br>Purpose /Capacity | Location |
|---|---|---|---|
| SCBA with spare tanks | 2 | Self-contained breathing apparatus; 30-minute air supply | Office |
| Aprons | 2 | Protect skin and clothing | Safety equipment storage rack |
| Gloves | 12 | Protect skin from vapors, splashes, free liquids | Safety equipment storage rack |
| Tyvex suits | 12 | Protect skin and clothing from hazardous waste | SPILPACs, storage rack |
| Boot Shields | 12 | Protect skin from vapors, splashes, free liquids | SPILPACs, storage rack |
| SPILL CONTROL | | | |
| Soda Ash | 100 lbs. | Neutralization and containment of acids | Warehouse rooms, SPILPACs, |
| Absorbent | 10 bags | Liquid absorbent and packing equipment | Warehouse rooms, SPILPACs |

| Equipment | Number | Capabilities<br>Purpose /Capacity | Location |
|---|---|---|---|
| Forklift | 1 | Moving/loading drums and heavy equipment | Warehouse area |
| Salvage Drums | 10 | Overpacking of damaged drums | SPILPACs, storage area |
| Plastic (polyethylene) | 1 per SPILPAC | Containment of hazardous spills, 10' X 20' | SPILPACs |
| Shovels | 1 per SPILPAC | Used in cleaning up debris | SPILPACs |
| Broom | 1 per SPILPAC | Used in cleaning up debris | SPILPACs |
| Duct Tape | 1 per SPILPAC | Used for temporary plugging of leaks | SPILPACs |
| EMERGENCY DECONTAMINATION AND FIRST AID | | | |
| Emergency Shower/ Eyewash Stations | 5 | Decontamination of skin, eyes, and/or clothing | Warehouse rooms (Refer to Figure CPA-1, page A- 5) |