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STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968  
(505) 984-0020

December 30, 1986

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

William Moore, President  
RINCHEM COMPANY, INC.  
6133 Edith Blvd, N.E.  
Albuquerque, NM 87107

RE: Part B  
NMD085267961-002208627

Dear Mr. Moore:

The Environmental Improvement Division (EID) has completed a review of the Part B Hazardous Waste Permit Application submitted by Rinchem. This letter is EID's notice that, based on this review, the Part B is incomplete and/or deficient in many areas. The purpose of this letter is to delineate in writing those areas identified during this review.

This review indicated that the Part B is incomplete and/or deficient as follows:

Facility Description:

1. Section D. Rinchem needs to discuss the access road surfacing and load bearing capacity from Edith to the facility; and, provided an estimate per unit time of the traffic volume along Edith. (HWMR-3, 302.A.4.b.1(j)). 1-15 ✓
2. Section E, Page 13. Rinchem needs to provide information on, or discuss the compatibility of the drum pump with the chemicals it may come in contact with. (HWMR-3, 302.A.4.b.1.(h)). 1-21 ✓
3. Section E, Page 28. Is the aisle space between each row of drum also 120 inches? (HWMR-3, 206.B.9.g). 1-28 ✓
4. Section E, Page 28. Rinchem needs to change the reference from "page CP-22" to "page CP-23". 1-28 ✓

5. Section E, Page 39. Rinchem needs to identify the sealant used to cover the concrete floor, and discuss the chemical compatability of the sealant with the chemicals in storage. (HWMR-3, 302.A.4.b.2.(a)).

SECURITY:

6. Figure 10. Page 44. Rinchem needs at least two additional warning signs in English and Spanish on the south perimeter fence. (HWMR-3, 206.B.4.c).

TRAINING:

7. Section B, Page 63. The word "to" needs to be added in the first sentence after the word "ability".
8. Section F, Page 75. Rinchem needs to provide documentation that demonstrates each instructor is qualified to provide training in the area of hazardous waste management. (HWMR-3, 206.B.6.a).

CONTINGENCY PLAN:

9. Section C, Page 77. The reference to "page 22" needs to be changed to "page 23".
10. Section D, Page 77. The second reference to "(page CP-5)" needs to be changed to "(page CP-6)".
- ✓ 11. Section F, Page 78. The reference to "(pages CP-14 through CP-15)" needs to be changed to "(pages CP-15 through CP-17)".
- ✓ 12. Section G, Page 78. The reference to "(page CP-22)" needs to be changed to "(page CP-23)".
- ✓ 13. Section I, Page 79. The reference to "Page CP-10 through CP-12)" and the reference to "(page CP-12 through CP-14)" needs to be changed to "(pages CP-11 through CP-12)" and "(page CP-12 through CP-13)" respectively.

CLOSURE REQUIREMENTS:

- ✓ 14. Section B.3, Page 82. Rinchem needs to provide additional information how any rinsate will be collected; the number of samples that will be collected to determine when the facility and/or equipment is clean; what samples will be analyzed for; the test methods that will be used to analyze the samples; and, how the samples will be preserved. (HWMR-3, 206.B.3.c).
15. Section B.4, Page 83. Rinchem needs to provide additional information on the pretreatment process. This may require a major revision to your Permit that you only requested a storage permit. (HWMR-3, 302 A.4.b).
- ✓ 16. Section B.4.1, Page 83-84. Rinchem is proposing to complete closure in 90 days. It is recommended that this be changed to 180 days for complete closure activities. (HWMR-3, 206.D.2.d).

CONTAINERS:

17. Section D, Page 89. Rinchem needs to provide the per cent slope of the floor to the drains. (HWMR-3, 206.D.4.f). ✓
18. Section H, Page 90. Rinchem needs to discuss in detail how the drums will be separated; if they will be on pallets; and, if the drums will be stacked. (HWMR-3, 206.D.4.h). ✓

WASTE ANALYSIS PLAN:

19. Section 2.5.2, Page 10. When sampling for organics the sample bottle must not have any air bubbles. (HWMR-3, 206.B.3). ✓
20. Section 3.4, Page 15. The reference to "(page 7)" needs to be changed to "(page 8)". ✓

CONTINGENCY PLAN:

21. Section B.2, Page 4. The reference to "(page 6)" needs to be changed to "(page 7)", the reference to "(page 17)" needs to be changed to "(page 18)", and the reference to "(page 14)" needs to be changed to "(page 15)". ✓
22. Section E.2, Page 10. Rinchem needs to discuss how hazardous waste will be removed from the secondary containment system after a spill. This discussion to include compatibility of equipment for removal with the hazardous waste that could be spilled; time from detection to removal; and, if samples are collected for analysis the same information requested in number 14 above. (HWMR-3, 302.A.4.b.(2).(a)). ✓
23. Section I.3, Page 22. Rinchem needs to discuss how decontamination will be accomplished, and if samples are required, provide the same information as requested in number 14 above. (HWMR-3, 302.A.4.b.(1).(g)). ✓
24. Section K, Page 24. Rinchem needs to submit the incident report to the Director, EID, rather than the Regional Administrator (HWMR-3, 302.A.4.b.(1).(g)). ✓

CERTIFICATION:

25. Rinchem needs to modify the "Certification and Signatory" page to contain the language required by HWMR-3, 302.B.4. ✓

INSURANCE:

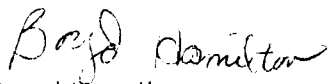
26. Rinchem needs to provide the insurance documentation required by HWMR-3, 302.A.4.b.(1).(g). ✓

In accordance with HWMR-3, 302.A.3., Rinchem needs to correct the deficiencies and/or provide the information requested herein before EID can continue to process the permit application. It is requested that this information be provided within 30 days.

Rinchem must also submit a copy of their response to EPA, Region VI. to the attention of Marc Sides.

If you have any questions regarding this review, please feel free to contact me at the New Mexico Environmental Improvement Division, 1190 St. Francis Drive, P.O. Box 968, Santa Fe, New Mexico 87504; or call (505) 827-2926. Please also address to my attention, the information you provide in response to this letter.

Sincerely,



Boyd Hamilton  
Environmental Supervisor  
Hazardous Waste Section

BH/aw

cc: Marc Sides, EPA