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FEB 23 1989  
HAZARDOUS WASTE BUREAU

Rinchem Company, Inc.

Comments on the SIF Report

1. RCRA investigations have taken place at the site in the past. The current and possible future RCRA involvement at the site is being investigated. RCRA involvement could prevent the placement of the site on the NPL.
2. Documentation for the SIF report is weak. For example, there is little information on the citizens complaint of waste discharge from the fiberglass tanks and there is little information on the waste handled at the site.
3. In future LSI reports the HRS evaluation should be consolidated and kept independent from the report. Also, supporting references should be included with the HRS evaluation.
4. The detection limits for samples collected on October 24, 1988, from monitor wells, were above the Primary Drinking Water Standards for cadmium, chromium and lead. It is recommended that the detection limits be lowered to detect contaminants at the Primary Standard levels.
5. The values for the Toxicity/Persistence matrix for the two solvents evaluated are less, based on values used by the NPL quality assurance team.
6. The use of the quantity of waste that has passed through the facility for "waste quantity" appears to be unacceptable based on the information provided. The quantity of waste stored on the site at any one time would be a more easily justified quantity. In addition, if the facility underwent a RCRA closure the waste handled would probably be subject RCRA regulations and not CERCLA regulations.

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were not known to have been handled @  
the facility

Item #5

based on HRS handbook Tox/Persist.  
ok

but MITRE uses different matrix  
Doug provided a copy of MITRE matrix

item #6

a) re: RCRA closure

no info. in our files

Doug will ask RCRA section in Dallas  
(poss. if no closure occurred, then  
site could be considered abandoned &  
& be a Superfund site).

## Summary

- #1 Doug handling
- #2 Doug would like copies of references
- #3 Almerin will do for future work; Doug will let Steve know
- #4 Doug will investigate need for <sup>routine</sup> A/A ~~matrix~~ for Pb, Cr, & Cd
- #5 nothing needed
- #6 Randy will double check