



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

June 20, 1994

Ms. Barbara Hoditschek
RCRA Permits Program Manager
Hazardous and Radioactive Materials Bureau
New Mexico Environment
1190 St. Francis Drive,
Santa Fe, New Mexico

RE: 6/21/94 Meeting on a Rinchem Permit Revision.

Dear Ms. Hoditschek;

Jim Moore and I are looking forward to meeting with you tomorrow. In preparation for that meeting we have identified the scope of the modifications, completed a Permit Fee Worksheet (EIB Hazardous Waste Fee Regulations) and have drafted the concepts we intend to cover in the permit modification. A copy of the Permit Fee Worksheet is attached. We have determined the modification to be a Class 3 modification (40 CFR 270.42).

Rinchem proposes a Class 3 modification to its existing permit to increase the size of its existing hazardous waste management unit used to store hazardous waste and increase the waste storage capacity from 500 drums to 1000 drums, or an equivalent volume, of liquids and solids. As a part of this modification, we also wish to modify the training plan and contingency plan, expand the waste codes which can be stored at the facility to include all RCRA regulated waste codes, accept foreign wastes for storage and treatment at our facility. In the course of transport from our location to an approved disposal site, be able to shred, crush and compact RCRA regulated waste and debris, be able to neutralize corrosive wastes on-site and be able to solidify/stabilize hazardous wastes at our facility.

Two years ago Rinchem expanded its chemical warehouse facility by adding additional warehouse rooms for corrosives. This addition meets the Hazardous Materials storage requirements for a chemical storage warehouse specified by the City of Albuquerque and Bernalillo County. It is equipped with modern docks and materials handling equipment, segregated secondary containment and fire suppression systems. We have been using our Albuquerque facility as a chemical storage facility and a transfer station, as defined in EPA 40 CFR 263, and have housed hazardous waste at this facility for a period of ten days or less during the course of transport. This facility is designed to properly segregate incompatible hazardous materials and hazardous wastes. We propose to use the same segregation scheme during storage of hazardous waste under the TSDF permit as is used and approved by the local, state and Federal regulatory authorities, including the fire authorities and Department of Transportation. We are seeking to double our

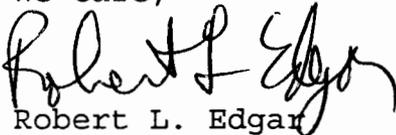
hazardous waste storage permitted capacity to correspond to this doubling in warehouse floorspace.

Rinchem, for the last several years, has managed hazardous wastes produced in Mexico for disposal in EPA permitted disposal facilities within the US. Mexican law requires any company located in Mexico which uses foreign produced hazardous materials in their process to export the resulting hazardous wastes for disposal. It is common for manufacturing firms located on the Mexican border to use US manufactured chemicals. These wastes have routinely been imported into the United States and stored at our facility for ten days or less during the course of transport to an approved TSDF. We are experienced, and have a good track record properly characterizing this waste for acceptance by EPA permitted disposal facilities, and with safely handling, transporting and managing Mexican waste for disposal. We intend to modify our permit to include storage of Mexican wastes destined for final disposal at an EPA approved disposal facility.

Rinchem proposes to bulk regulated wastes at the Rinchem facility. We intend to accept wastes from large, small and conditionally exempt small quantity generators of hazardous waste. We intend to perform the quality assurance and quality control as stated in our permit to verify what we receive. This program is intended to provide an option for the large, small and conditionally exempt small quantity employers in New Mexico, and across the border in Mexico which is safer for the public and the environment.

We intend to modify our permit to be able to crush glass which is regulated hazardous waste. This includes fluorescent bulbs and glass vile containers which will not pass TCLP. We intend to modify our permit to shred hazardous waste solids in preparation for more economical and safer shipping to final disposal sites. We intend to modify our permit to solidify and stabilize hazardous waste to increase the safety of hazardous waste transport. We intend to neutralize corrosive wastes for appropriate permitted discharge into sewage systems or to more safely transport the wastes.

We Care,



Robert L. Edgar
Director of Health, Safety, Training
and Environmental Compliance

AGENDA

Meeting between Rinchem Company, Inc.
and
NMED Hazardous & Radioactive Material Bureau

10:00 am on June 21, 1994

1. Discussion of Proposed Permit Modification
 - A. Letter
 - B. Classification of Modifications and Fee Determination
 - C. Documentation requirements for modifications
2. Contingency Plan Modification to assign new Emergency Coordinator and Alternatives

TABLE 11.6
PERMIT FEE WORKSHEET

FACILITY NAME Rinchem Company, Inc.
 PERMIT NUMBER NM NM D 986682466
 PERMITTED ACTIVITY (By Unit) Hazardous Waste Storage Area

GROUNDWATER MONITORING? YES NO
 ESCAPED CONSTITUENTS? YES NO
 PUBLIC PARTICIPATION? YES NO

	FEE CALCULATION	REMARKS
BASIC PERMIT	\$ <u>13,000.</u>	<u>206-Rev.</u>
OPERATING UNIT 1	<u>5,000.</u>	<u>201-Str.</u>
OPERATING UNIT 2	<u>8,000.</u>	<u>202-Treat.</u>
OPERATING UNIT 3	_____	_____
OPERATING UNIT 4	_____	_____
OPERATING UNIT 5	_____	_____
OPERATING UNIT 6	_____	_____
POST-CLOSURE CARE UNIT 1	_____	_____
POST-CLOSURE CARE UNIT 2	_____	_____
POST-CLOSURE CARE UNIT 3	_____	_____
POST-CLOSURE CARE UNIT 4	_____	_____
SUB TOTAL	\$ <u>26,000.</u>	
PUBLIC PARTICIPATION FEE	<u>4,000.</u>	
TOTAL FEE DUE	\$ <u>30,000.</u>	