



BRUCE KING
GOVERNOR

July 29, 1994

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

Red File

Mr. Bob Edgar, Director
Health, Safety, and Training
Rinchem Company, Inc.
6133 Edith Blvd. NE
Albuquerque, New Mexico 87107

Dear Mr. Edgar:

Enclosed is a copy of the minor changes in language that I am proposing to the Class I Permit Modification request that you sent to us June 20, 1994. These are proposed to clarify the exact procedures to be followed in the event of future changes in the Emergency Coordinator list which I understand is one of the major intents of your request. (i.e. so a future Class I modification and associated fees will not be initiated each time the coordinator list is changed.) Please review the enclosed changes and call me at (505) 827-4308 at your earliest convenience of your comments or concurrence so that I may proceed with the package development for the Director's decision.

Also enclosed are some guidances and regulations that Ms. Witkowski asked me to send her. If you would give these to her I would appreciate it.

Sincerely,

Marc Sides

Marc Sides, IPA
Hazardous and Radioactive Materials Bureau

cc: Barbara Hoditschek, HRMB Program Manager

accurate. A dated copy of the revised training program will be submitted to the Director for the permit files and permit modification in accordance with HWMR-4, Section 302.0. prior to its implementation.

G. REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of HWMR-4, Section 206.B.7.

H. PREPAREDNESS AND PREVENTION

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in Permit Attachments C and E.

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in permit paragraph II.H.1. above as necessary to assure its proper operation in time of emergency.

3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by HWMR-4, Section 206.B.9.e. and 206.B.9.f.

I. CONTINGENCY PLAN

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of Permit Attachment E whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Amendment of the Plan. The Permittee shall review and immediately amend, if necessary, the Contingency Plan, as required by HWMR-4, Section 206.B.10.k.

3. Copies of the Plan. The Permittee shall comply with the requirements of HWMR-4, Section 206.B.10.j. A dated copy of any amended Contingency Plan will be submitted to the Director for the permit files, and the permit shall be modified in accordance with HWMR-4, Section 302.0 prior to its implementation of the amended Contingency Plan except for updates to the list of Emergency Coordinators. The Permittee shall immediately provide the Program Manager of the Hazardous and Radioactive Materials Bureau an update to Permit Attachment E, Section C, Table CP-1 for incorporation into this Permit on the effective date of any updates to the Table.

4. Emergency Coordinator. The Permittee shall comply with the requirements of HWMR-4, Section 206.B.10.l concerning the emergency coordinator.

J. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of HWMR-4, Sections 203.A., B., and C. for any hazardous wastes received by the Permittee and shipped off-site for treatment, storage or disposal.

K. RECORDKEEPING AND REPORTING

1. Facility Operating Record.

- a. The Permittee shall maintain at the facility, until the end of the closure period, a written record of waste and decontamination washwater analyses. The following shall be recorded:

(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 alternates 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 all of them will be out of reach on the same day, a surrogate 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

The current list of the Emergency Coordinator and Alternate Emergency coordinator is maintained in close proximity to each telephone in the facility and a copy of the current list is kept in the Part B Permit Contingency Plan, Attachment E, Section C.

A dated revised copy of Table CP-1 will be is also supplied to the New Mexico Environmental Department, RCRA Permit Program, Hazardous and Radioactive Materials Bureau (HRMB) whenever on the effective date of a change to the

names, addresses or phone numbers occurs of the emergency coordinator list.

Any updated Table CP-1 sent to the HRMB will be accompanied by a letter from the Permittee requesting replacement in the Permit of the previous Table.

Periodic updates to Table CP-1 may be made outside of the formal Permit modification request procedures.