



BRUCE KING
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
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Santa Fe, New Mexico 87502
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JUDITH M. ESPINOSA
SECRETARY

RON CURRY
DEPUTY SECRETARY

September 8, 1994

James H. Moore, Jr.
Director of Operations
Rinchem Company, Inc.
6133 Edith Blvd. N.E.
Albuquerque, New Mexico 87107

Dear Mr. Moore:

The New Mexico Environment Department (NMED) has reviewed the permit modification requested by Rinchem Company, Inc. on June 20, 1994, to the operating permit for the facility. We agree that the modification requested is a Class I permit modification that may be implemented with NMED approval.

The modifications are to page #13 of the permit text and permit attachment E, Section C, (Contingency Plan) pages #4, 5, and 6. The modification also adds Table CP-1 to permit attachment E as the current emergency coordinator list. No other modifications are made to the permit.

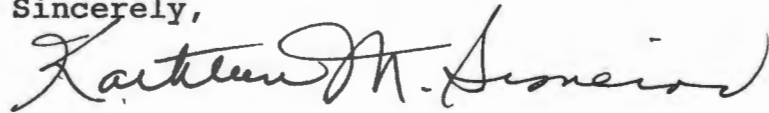
The NMED hereby approves your permit modification request. Enclosed are the approved changes to the permit. These pages are to be incorporated into the permit. Also enclosed is a public information mailing list. The New Mexico Hazardous Waste Management Regulations (HWMR-7), Part IX, Section 270.42 requires that you send a notification of the permit modification to all persons on the enclosed list within 90 days after receipt of this letter. On your public notification you should indicate that Marc Sides at (505) 827-4308 is the Department contact.

Under HWMR-7, Part IX, Section 270.42 any person may request that the NMED review, and the NMED may for cause reject the modification. If this instance occurs you will be notified by certified mail that the Class I modification has been rejected and an explanation of the reasons for the rejection will be provided. If the Class I modification is rejected then you must comply with the original permit conditions.

Mr. James H. Moore
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Please contact Marc Sides of my staff at (505) 827-4308 if you have any questions.

Sincerely,



Kathleen M. Sisneros, Director
Water and Waste Management Division

Enclosures

cc: Barbara Hoditschek, HRMB Program Manager
Benito J. Garcia, Chief HRMB
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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 modification 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 RCRA Permitting Section in 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.10.1 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:

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 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.

Emergency Coordinator & Alternates List

Table CP-1 of Rinchem Company, Inc.'s Part B Permit Contingency Plan

Coordinator	Address	Phone Numbers
Gary Michaelson CES Operations Manager	377 Teles Los Lunas, NM 87031	Home: 865-7690 Mobile: 269-4405 Sky Page:
<i>1st Alternate:</i> Paul Levesque ABQ Administrative Coordinator	7409 Derrickson NE Albuquerque, NM 87109	Home: 823-0180 Pager: 766-0939
<i>2nd Alternate:</i> Jim Moore Director of Operations	341 Mockingbird Lane Corrales, NM 87048	Home: 898-8245 Mobile: 269-4404

C.1 Emergency Coordinator and Emergency Coordinator Alternate

The Emergency Coordinator and appointed alternates at the Rinchem facility have a good knowledge of the Contingency Plan and emergency procedures that are found in the plan. They know about the safety equipment and communication devices that are found in the facility. They have knowledge of all the chemicals that are stored at the Rinchem facility and the hazards that accompany each chemical. The Emergency Coordinator and the alternates have 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 or the Alternate Emergency Coordinator on site will be responsible for the following notifications if necessary.

Table CP-2 Emergency Telephone Numbers

<u>Agency</u>	<u>Phone Number</u>
Bernalillo County Fire Dept/Sheriff's Office	911
State Emergency Response Team	827-9329
St. Joseph's Northeast Heights Hospital	888-7800