



COMPANY, INC.

6133 EDITH BOULEVARD NE
ALBUQUERQUE, NM 87107
PHONE (505) 345-3655

September 8, 1994

Ms. Barbara Hoditschek
RCRA Permits Program Manager
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
1190 St. Francis Drive
Santa Fe, New Mexico 87502

RE: Rinchem Company, Inc.'s Permit Revision

Dear Ms. Hoditschek:

Per your request made during your conversation with Jim Moore and me on September 6, I am writing to let you know that we intend to submit a reapplication of our Part B permit. The changes we plan to make are those discussed in Bob Edgar's letter to you dated June 20, 1994, (see the attached copy) and involve:

- increasing the size of the hazardous waste management unit
- increasing the storage capacity from 500 to 1000 drums, or an equivalent volume, of solids and liquids
- modifying the training and emergency contingency plans
- expanding the list of waste codes that can be stored at the facility to include all RCRA regulated waste codes
- accepting foreign waste for storage and treatment at our facility
- shredding, crushing and compacting RCRA regulated waste and debris in the course of transport
- having the ability to neutralize corrosive wastes on-site
- having the ability to solidify/stabilize hazardous wastes on-site

We will also be bringing the permit into compliance with current RCRA permit regulations.

We intend to reapply for our permit because we believe that it would simplify the process and make it easier for you to review since most of the sections will be affected. Also, since our permit expires in just a little over 3 years, reapplication now will prevent reapplication and review in the near future.

WE DO IT WELL

BECAUSE WE CARE

Our decision to reapply for the permit was based on the assumption that the fees and the time it will take for your department to approve the reapplication will be comparable to the fees and approval time for a Class 3 modification involving the same issues. We also assume that we would be able to continue operating our facility in the way we have been under our current permit.

Based on our knowledge at this point, we are projecting that we will have our reapplication to you by the first of December, 1994. If your department's schedule will not allow you to start reviewing our application at that time, we would appreciate your letting us know.

We would appreciate any feedback you give us concerning the time and costs involved with reapplying for our permit rather than submitting a Class 3 modification.

Thank you for your time and consideration.

We Care,


Stephanie J. Witkowski
Training and Regulatory Compliance Assistant

attachment