

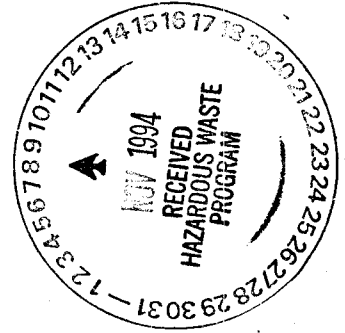


RINCHEM COMPANY, INC.

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

November 4, 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 87501



RE: Permit Modification Request, Training

Dear Ms. Hoditschek:

This is a request for a modification to the Rinchem Part B Permit. The modification is to replace "Permit Attachment D, Personnel Training" in our current permit with the attached pages. This modification was designed to comply with RCRA Part B training requirements(40 CFR 270.14(b)(12)), and satisfy other regulatory training requirements as well.

This modification appears to be a class 1 modification since it increases the hours of training compared to the current commitment in our permit, and provides the same type of training (covering the same subjects) that is included in the current Permit Attachment D (40 CFR 270.42, Appendix I(B)(5)).

Please evaluate this modification to determine the modification class, assess the fee for the modification and evaluate the modification for compliance with RCRA Permit requirements. We will issue you a check for the modification fee upon obtaining the assessment from you.

If you have any questions on this request, feel free to contact me.

We Care,

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

WE DO IT WELL

BECAUSE WE CARE

TRAINING PROGRAM [40 CFR 270.14(b)(12)]

The primary objective of Rinchem's training program is to instruct employees in the practices, procedures and rules regarding safe operation and maintenance of the facility in accordance with applicable state and federal regulations. The training program requires at least 24 hours training in safety, proper transport and response to hazardous waste emergencies. These classes can be conducted by Rinchem's training department, governmental agencies such as the EPA or DOE and/or outside training providers. The instruction is in the form of classroom instruction and on-the-job training. The training classes and program will be updated as necessary to meet the regulations.

All new employees who handle hazardous waste will complete the initial training courses within six months of their date of hire or transfer of job assignment. Personnel will not work unsupervised in their positions until they have completed 24 hours of training. Annually, all personnel must participate in a minimum of eight hours of review of the initial training.

Some examples of training courses which will satisfy all or part of the training include:

- Initial Facility Orientation
- OSHA 40-hr Emergency Response Technician
- OSHA 8-hr Refresher
- DOT Hazardous Materials Transportation Training

Some examples of course contents follow.

EXAMPLE OF INITIAL FACILITY ORIENTATION COURSE CONTENTS

The key elements of the program include:

- Discussion of Emergency Preparedness Plan for Rinchem Facility

 - Hazard Identification and Discussion

 - Storage and Segregation

 - Contingency Plan and Emergency Procedures

- Facility Tour

 - Identify Safety Features

 - Identify Communications and Alarm Systems

 - Discuss Evacuation Routes

- Standard Operating Procedures

 - Review of Procedures to Perform Operations at Facility

 - Safety Practices

The training will consist of lectures, discussions, exercises, examinations and on-the-job training.

EXAMPLE OF OSHA 40-HOUR EMERGENCY RESPONSE TECHNICIAN [29 CFR 1910.120(q)] COURSE CONTENTS

The key elements of the program include:

Emergency Response to Hazardous Materials Incidents

Characteristics of Hazardous Materials

Information Resources

Identifying Hazardous Materials

Levels of Protection

Chemical Protective Clothing

Response Operations: Safety Plans and SOP's

Response Operations: Size-up

Response Operations: Strategy and Tactics

Site Entry

Incident Control: Confinement and Containment

Direct-Reading Instruments

Response Organization /Incident Command

Level A Demonstration

Decontamination

Establish Incident Command for Transportation Incident

Organize for Transportation Incident

The training will consist of lectures, discussions, exercises and examinations.

**EXAMPLE OF OSHA 8-HOUR REFRESHER [29 CFR 1910.120] COURSE
CONTENTS**

The key elements of the program include:

Hazardous Waste Management and Regulations

Sources of Information

Compatibility of Hazardous Wastes

Personnel Protection

Principles of Safety

Emergency Procedures

The training will consist of lectures, discussions and exercises.

**EXAMPLE OF DOT HAZARDOUS MATERIALS TRANSPORTATION TRAINING
[49 CFR 172.700] COURSE CONTENTS**

The key elements of the program include:

General Awareness/Familiarization

Identification of Hazardous Materials

Packaging

Marking

Labeling

Shipping Papers

Placarding

Separation and Segregation

Unique Moves

Safety

Hazardous Waste Transportation Issues

The training will consist of lectures, discussions, exercises and examinations.