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ENVIRONMENT DEPARTMENT
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SECRETARY

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 22, 1994

Robert Edgar
Director of Health, Safety,
Training and Environmental Compliance
Rinchem Company, Inc.
6133 Edith Boulevard NE
Albuquerque, NM 87107

Dear Mr. Edgar:

RE: Letter of Approval for Permit Modification, Class I
EPA ID NO. NMD002208627

The Hazardous and Radioactive Materials Bureau (HRMB), of the New Mexico Environment Department (NMED), is in receipt of Rinchem Company, Inc.'s hazardous waste permit fee (letter dated December 12, 1994, Check No. 33948), for Rinchem's requested Class I Permit Modification to their existing Hazardous Waste Facility Permit (HWFP), Attachment D, Personnel Training, issued on January 8, 1988.

HRMB is in agreement that the permit modification proposed by Rinchem is a Class I Modification, and the NMED hereby approves Rinchem's request for a permit modification to their personnel training plan.

Enclosed (Attachment A), is a copy of the modification which will replace Rinchem Company Inc.'s HWFP, Attachment D, Personnel Training. Rinchem will incorporate these pages into their facility copy of the document as the approved facility training plan.

Rinchem is required to send a notice of the modification to all persons on the facility mailing list enclosed (Attachment B), maintained by the HRMB in accordance with 20 NMAC 4.1 Subpart IX, 40 CFR §270.42 (a)(1)(ii). This notification must be made within 90 calendar days after the modification is put into effect.

Mr. Robert Edgar
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If you should have any further concerns or questions regarding this matter, please feel free to contact Phillip Solano of my staff at (505) 827-4308.

Sincerely,



Kathleen M. Sisneros
Director, Water and Waste Management Division

Enclosures (2)

cc: Benito Garcia, Chief HRMB
Barbara Hoditschek, Program Manager HRMB
Marc Sides, HRMB IPA
David Neleigh, Chief EPA Region VI
Red File, 94

ATTACHMENT A

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.

ATTACHMENT B