

M E M O R A N D U M

To: Benito J. Garcia
From: Phillip Solano *PS*
Date: April 7, 1995
Subject: "Old Rinchem Site" meeting with Ed Kelley

A meeting was held with Ed Kelley in his office at 9:30 a.m. to discuss new developments regarding the "Old Rinchem Site". Those in attendance were:

Ed Kelley, Director Water & Waste Management Division
Darren Padilla, Ground Water Protection & Remediation Bureau
Baird Swanson, Ground Water Protection & Remediation Bureau
Coby Muckelroy, Hazardous & Radioactive Materials Bureau
Phillip Solano, Hazardous & Radioactive Materials Bureau

The intent of this meeting was to brief Ed Kelley regarding the issue of contamination at the "Old Rinchem Site". Mr. Kelley will be meeting with Rinchem Company, Inc. (RCI) on April 14, 1995 at 1:00 p.m. at the new facility location for a site tour and data evaluation.

It appears that the Ground Water Bureau is of the opinion that there is in fact contamination, the extent of which has not been, and is not being assessed in a timely and expeditious manner. There was mention that EPA, for whatever reason(s), is and has allowed RCI ample time to assess the extent of contamination. Acetone was detected at a depth between 40 to 80 feet. PCE was also detected, and TCE was detected in the ground water but not in the soil. Comment was also made as to the integrity of RCI with regard to the divulgence of sampling analysis data, the viewing of past transporter manifests, and disclosure of sampling analysis information (an absolute need to know basis only). RCI has acquired the services of a consulting firm, Canonic Corporation (CC). CC requested that Passive Soil Gas Samplers (PETREX) be placed on 25 ft. grids. It is believed that RCI will attempt, at this meeting on April 14 with NMED, to correlate the PETREX data with the surface soil data and the groundwater monitoring data.

Coby Muckelroy stated that RCI's compliance history was acceptable. In the past RCI has been issued notices of violation, but no compliance orders.

I informed Mr. Kelley that the Permitting Section was currently reviewing RCI's operating permit reapplication.

Ed Kelley stated that his position at this meeting with Rinchem will be one of unity, stating that there definitely is a need to evaluate and scrutinize the sampling data. In the event that RCI is not placed on the National Priority List by EPA, RCI will have to contend with NMED "under our options".

cc: Barbara Hoditschek
Marc Sides

CONFIDENTIAL

Old Rinchem Site

April 6, 1995

Site History:

The Old Rinchem site (Site) is located at 5001 Edith Blvd., NE, Albuquerque, NM.

Rinchem Company, Inc. leased the site and operated a hazardous waste transfer and holding station from 1979 until 1983. Rinchem transported hazardous waste to the Site where it was repackaged or stored until a large quantity was accumulated. The waste was then transported back to the generator or to a permitted disposal facility.

In 1980, a citizen complaint documented a surface accumulation of liquid on the Rinchem Site and noted that at least some of this liquid was from leaks that occurred during tank-truck unloading and discharges from two large tanks.

EPA, under the authority of RCRA inspected the facility in 1981, 1982, and 1983. At least one notice of violation (NOV) was sent to Rinchem during this time.

NMEID, under the authority of CERCLA, performed a Preliminary Assessment in 1983 and a Site Inspection in 1984. Numerous volatile (including chlorinated solvents) and semivolatile organic compounds and pesticides were identified in soil samples collected at the Site. Additionally, chlorinated solvents were identified in samples collected from an abandoned well located at the Site. In 1988 the NMEID conducted a Site Inspection follow up at the Rinchem Site. This Site Inspection determined that the type of contaminants found in the on-site soil and ground water were also identified as having been transported to the Rinchem facility while they were operating the hazardous waste transporting and holding facility.

On October 14, 1992, the Site was proposed for inclusion on the National Priorities List (NPL). The Site has not yet been listed on the NPL, but may be listed by the end of this year.

On August 22, 1994, a meeting was held in Albuquerque between Congressman Steve Schiff, community groups, City of Albuquerque, County of Bernalillo, EPA, NMED, and Rinchem, Co. During this meeting, Rinchem, Co. gave a presentation about their efforts at the site. Congressman Schiff wanted to know how the site could be kept off the National Priorities List (NPL). EPA responded by telling him that the comments period was over, and that EPA was proceeding with their evaluation for inclusion onto the NPL. The City of Albuquerque, the County of Bernalillo, and the community groups were very much opposed to the listing of the Site. The City of Albuquerque representatives did not agree with the Hazardous Ranking System

(HRS) scoring of the Site; and they also praised Rinchem, Co. for the services they provide to the community. During the meeting Congressman Schiff said that he was going to discuss the site with government officials in Washington, D.C.

During December of 1994, Rinchem installed passive soil gas probes at the site, and collected surface soil samples.

On January 30, 1995, EPA required Rinchem, Co. to install two (2) additional monitor wells. Of these wells, one is to be drilled to and screened above the 1st significant clay layer (>5 feet), or a maximum depth of 250 feet. The other monitor well is to be completed at the same depth as the existing on-site monitor wells.

Concerns:

The aquifer has not been sampled at depth, thus it is unknown whether contaminant concentrations increase with depth. This has been known to occur at DNAPL sites in the Albuquerque Basin. Concentrations of contaminants found in the shallow, on-site monitor wells exceed drinking water MCL's. NMED persuaded EPA to require Rinchem, Co. to install a second, deeper well adjacent to the shallow monitor well EPA has required for their Risk Assessment. This deeper, downgradient well will be used to determine the vertical extent of contamination at the Site. The two monitor wells are scheduled to be installed during the first week of May, 1995.

On two occasions, NMED staff has received verbal comments from a Rinchem employee that Rinchem found highly contaminated soil during their 1992 soil sampling.

It is possible that EPA will determine that the Site will not be placed on the NPL based on the results of the Risk Assessment EPA will be conducting this spring. If that is the case, then what enforcement actions should NMED take to have the site characterized and remediated? The Site could be handled under Section 1-203 of the New Mexico Water Quality Control Commission (WQCC) regulations. The Remediation Section of the Ground Water Protection & Remediation Bureau has had success in enforcing 1-203 violations through Administrative Orders on Consent (AOC) and voluntary cleanups.