

**RINCHEM COMPANY, INC.**8133 EDITH BOULEVARD NE  
ALBUQUERQUE, NM 87107  
PHONE (505) 345-3666

September 28, 1995

Frank Sanchez  
Hazardous and Radioactive  
Materials Bureau  
N.M. Environmental Dept.  
P.O.Box 26110  
Santa Fe, N.M. 87502

Dear Mr. Sanchez:

This letter is in response to the LETTER OF VIOLATION dated Sept. 7, 1995. Rinchem Company, Inc. acknowledges receipt of the letter and desires to make all appropriate procedural and operational changes necessary to ensure total compliance. As you indicated, we took corrective action at the time of inspection. However, we have since begun to plan respecification of storage areas that would be striped on the floors. Before doing this, we need to clarify some areas relative to your citation and the regulations.

Is there an environmental department interpretation of the term "any area of facility operation" which indicates the "area" is intended to be a drum or pallet sized space? Is there an environmental department determination of the required aisle space adequate to meet the intent of CFR 264.35 (i.e. 18 inches, 24 inches)? Also, there was some discussion of aisle space necessary to allow the reading of waste labels for which we could not find any reference in section 264 of 49CFR.

One of the issues we are trying to address is whether we can store drums of hazardous waste on pallets in pallet racks. In order for us to be certain we have covered, or will be covering, all appropriate concerns we would appreciate a written response to the 3 questioned areas so they can be addressed in training, written procedures and facility organization.

We sincerely appreciate your help in these matters. If you have any questions please contact me at the number listed above.

We Care

Scott Gariss  
Haz. Waste CSR**WE DO IT WELL****BECAUSE WE CARE**