



GARY E. JOHNSON  
GOVERNOR

State of New Mexico  
**ENVIRONMENT DEPARTMENT**  
Hazardous & Radioactive Materials Bureau  
2044 Galisteo  
P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-1557  
Fax (505) 827-1544



MARK E. WEIDLER  
SECRETARY

EDGAR T. THORNTON, III  
DEPUTY SECRETARY

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

April 24, 1996

Mr. James H. Moore Jr.  
Director of Operations  
Rinchem Company, Inc.  
6133 Edith Boulevard N.E.  
Albuquerque, New Mexico 87107

RE: **Technical Review Notice of Deficiency**  
**EPA ID NO. NMD002208627**

Dear Mr. Moore:

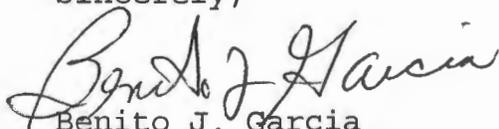
The Hazardous and Radioactive Materials Bureau (HRMB) of the New Mexico Environment Department (NMED) has completed a technical review of the Rinchem Company, Inc. (RCI), Resource Conservation and Recovery Act (RCRA) Hazardous Waste Part B Permit Application dated February 1995. HRMB has determined the Part B permit application to be technically deficient. Therefore, HRMB is requesting that RCI address the enclosed list of deficiencies (Attachments A and B). HRMB will declare the Part B permit application technically complete once RCI adequately addresses the enclosed information request.

Please submit the information requested by hardcopy and on a 3.5" diskette in WordPerfect 5.2, thereby expediting any further revisions that may be required. The information requested must be submitted to HRMB no later than 30 days from the date that you receive this notice. Failure to submit the required information within the specified time frame could result in the issuance of a Notice of Violation and/or a proposal to disapprove the Part B permit application.

Mr. Moore  
April 24, 1996  
Page 2

Should you have any questions regarding this matter or require a meeting with us, please contact Phillip Solano of my staff at (505) 827-1561.

Sincerely,



Benito J. Garcia  
Chief, Hazardous and Radioactive Materials Bureau

Enclosures (2)

cc: Barbara Hoditschek, HRMB RCRA Permits  
Susan Hoines, HRMB RCRA Technical Compliance  
David Neleigh, Chief 6PD-N, EPA Region VI  
RCI Red File '96

Sept 30, 1996



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION VI

ALLIED BANK TOWER AT FOUNTAIN PLACE

1445 ROSS AVENUE

DALLAS, TEXAS 75202



Mr. Jack Ellvinger, Program Manager  
Hazardous Waste Section  
Groundwater and Hazardous Waste Bureau  
Environmental Improvement Division  
New Mexico Health and Environment Department  
P.O. Box 968  
Santa Fe, New Mexico 87504-0968



Re: RCRA Facility Assessment Report  
Rinchem Company, Inc.,  
NMD002208627

Dear Mr. Ellvinger:

Enclosed please find a copy of the RCRA Facility Assessment Report for Rinchem Company, Inc., Albuquerque, New Mexico. The report includes both the Preliminary Review and Visual Site Inspection.

If you have any questions, please contact me or Erlece Allen of my staff at (214) 655-6790.

Sincerely yours,

Sam Becker, P.E.  
Chief  
Hazardous Waste Compliance Branch (6H-C)

Enclosure

ASSESSMENT  
PORT

BY, INC.  
NEW MEXICO  
02208827

by:  
Protection Agency  
VT  
Avenue  
75202

1987

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## 1.0 INTRODUCTION

The purpose of this report is to document the RCRA Facility Assessment for Rinchem Company, Inc., Albuquerque, New Mexico. The Preliminary Review (PR) and Visual Site Inspection (VSI) are the first two phases in the Resource Conservation and Recovery Act (RCRA) Facility Assessment under the RCRA corrective action program. The information in Sections 1.1 and 1.2 has been developed from the RCRA Facility Assessment Guidance (Ref. 1).

### 1.1 Hazardous and Solid Waste Amendments and other Authorities

The Hazardous and Solid Waste Amendments of 1984 (HSWA) provided the United States Environmental Protection Agency (EPA) with the authority to require corrective action at RCRA treatment, storage, and disposal (TSD) facilities. The new authorities are:

- 3004(u) - Corrective Action for Continuing Releases  
Requires that any permit issued after November 8, 1984, provide for corrective action for all releases from solid waste management units (SWMUs) at the facility. The provision also insists that owner/operators demonstrate financial assurance for any required corrective action, and allows schedules of compliance to be used in permits where the corrective action cannot be completed prior to permit issuance.
- 3008(h) - Interim Status Corrective Action Orders  
Provides authority to issue enforcement orders to compel corrective action or other response measures at interim status facilities, as well as authority to take civil action against facilities for appropriate relief.
- 3004(v) - Corrective Action Beyond the Facility Boundary  
Directs EPA to issue regulations requiring corrective action beyond the facility boundary where necessary to protect human health and the environment. The only exception to this is if the owner/operator can demonstrate that he is unable to obtain permission to take corrective action on off-site property. Until the regulations requiring corrective action beyond the facility boundary are promulgated, corrective action orders may be issued to require the necessary corrective action.

The 3004(u) provision focuses on investigating releases from solid waste management units at RCRA facilities. SWMUs are defined as "any discernible (solid) waste (as defined in 40 CFR 261.2) unit at a RCRA facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste" (Ref. 2). The SWMU definition includes containers; tanks; surface impoundments; waste piles; land treatment units; landfills; incinerators; underground injection wells; waste water treatment units; recycling units; and areas contaminated by routine, systematic, and

and deliberate discharges from process areas. The 3008(h) authority applies to any release from an interim status TSD facility. Other authorities under RCRA that apply include:

- 3005(c) - Permit Issuance  
Authorizes EPA, upon determination that a facility is in compliance with sections 3004 and 3005 of RCRA, to issue permits to TSD facilities that have applied for such permits.
- 3007 - Inspections  
Permits EPA to enter, inspect, sample, and examine records of any generator or TSD facility for purposes of developing any regulation or enforcing the provisions of RCRA.
- 3008(a) - Compliance Orders  
In case of a violation of Subtitle C - Hazardous Waste Management, this section authorizes EPA either to issue an order assessing a civil penalty and/or requiring compliance, or to commence a civil action for appropriate relief.
- Section 3013 - Monitoring, Analysis, and Testing  
Provides authority to order a hazardous waste TSD facility to perform monitoring, analysis and testing at the site, if there is a potential for a substantial hazard to human health or the environment. If the facility cannot perform the work, either EPA may perform or EPA may authorize the State to perform the monitoring.
- Section 7003 - Imminent Hazard  
Authorizes EPA to bring suit to stop handling, transportation, treatment, storage and disposal of a solid or hazardous waste if an "imminent or substantial endangerment to health or the environment" is present. Also, other action as necessary may be taken.

## 1.2 RCRA Corrective Action Program

The RCRA corrective action program based on the HSWA authorities consists of three phases:

- (1) The RCRA Facility Assessment (RFA) to identify releases or potential releases requiring further investigation.
- (2) The RCRA Facility Investigation (RFI) to fully characterize the extent of releases.
- (3) Corrective Measures (CM) to determine the need for an extent of remedial measures. This step includes the selection and implementation of appropriate remedies for all problems identified.

In particular, the intent of the RFA is to identify and gather information on releases at RCRA facilities, to evaluate solid waste management units for hazardous releases to all media, and to make

preliminary determinations regarding releases of concern and the need for further actions and interim measures at the facility. The RFA consists of potentially three phases: (1) the Preliminary Review (PR), (2) the Visual Site Inspection (VSI), and (3) the Sampling Visit (SV), if necessary. The PR focuses on evaluating existing data in the form of inspection reports, permit applications, historical monitoring data, and information obtained through interviews with State personnel who are familiar with the facility. The VSI is the second phase of the RFA and consists of a visit to the site to collect visual information to assist in determining whether releases have occurred. The optional third phase of the RFA is the SV, which may be used to fill data gaps, if any remain after completion of the PR and VSI.

### 1.3 Contents of this Report

This report presents the results of the PR and VSI of the Rinchem Company, Inc. facility in Albuquerque, New Mexico. The principal sources of information used in conducting the PR included the facility's permit application to New Mexico Environmental Improvement Division (NMEID), Health and Environment Department; and correspondence from and to NMEID (Ref. 3). These documents were obtained during a search of relevant files at the EPA Regional Office in Dallas.

The VSI was conducted August 28, 1987. The Rinchem representative present was William W. Moore, President of the firm. The EPA's representatives were Bobby Williams (lead) from Region VI Hazardous Waste Compliance Branch and Marcus Sides. NMEID was represented by Elizabeth Gordon.

Section 2.0 of this report contains a description of the Rinchem Company, Inc. facility, including its current operations. Individual SWMUs also are identified in Section 2.0 along with a summary description of the wastes managed by the facility. Section 3.0 provides an overview of the environmental setting at the facility, comprising floodplain and surface water, geology and soils information. Section 4.0 contains detailed discussions of each SWMU, including the potential for releases to soil, groundwater, surface water, and air. Section 5.0 covers conclusions and recommended actions. Section 6.0 provides a list of references. The VSI photograph log and the field log are presented as appendices to the report.

## 2.0 FACILITY DESCRIPTION

This section of the PR/VSI report covers the location of the facility, historical and current operations, and brief descriptions of the SWMUs that were identified and the wastes managed at the facility.

### 2.1 Location

The Rinchem Company, Inc. Albuquerque Chemical Distribution Center is located at 6133 Edith Blvd. N.E., Bernalillo County, New Mexico. The facility is a two-acre site located 600 feet west of Edith Blvd. and just east of the Santa Fe Railroad mainline (Figures 1 and 2). The facility is at 35<sup>o</sup> 26' 39" latitude and 106<sup>o</sup> 37' 43" longitude.

### 2.2 Current Operations

Rinchem is a new facility which began operations January 1, 1987. Rinchem moved their base of operations from 5001 Edith Blvd. N.E. in Albuquerque, New Mexico.

The waste stored for a maximum period of 10 day at the facility is generated offsite. The facility is used to temporarily store drums of waste from Rinchem and other transporters for eventual transfer to recycling centers, disposal sites, or other waste transfer stations.

The prime purpose of the property is to serve as Rinchem Company's Chemical Distribution Center. Approximately 80 percent of Rinchem's sales are prepackaged solvents, resins, fiberglass, and miscellaneous industrial chemicals. They are removed from van trailers, warehoused, and delivered in their original containers. The balance are received in bulk tank wagons. This portion is either drummed immediately or stored in bulk tanks for future drumming. A very small portion of Rinchem's output is blended and/or packaged in five gallon pails.

Rinchem warehouses other companies' products for hire at its Albuquerque Chemical Distribution Center. It is anticipated that more than half of the building's square footage will be used for public warehousing. Public warehoused inventory is under Rinchem's care and custody, but warehousing clients are involved in training and safety. They release the product for shipment as needed.

At this time, Rinchem is a transporter of hazardous waste and warehouses waste at its facility for a maximum period of 10 days. The transfer station receives drums of spent industrial waste from Rinchem and other transporters. The drums are consolidated for truckload shipment to waste recycling facilities, waste disposal sites, or other waste transfer stations, as necessary. The majority of waste handled by Rinchem is organic solvents to be recycled or incinerated. Other wastes which are handled at this time include solid waste, and aqueous solutions containing heavy metals, alkaline materials, and oil. Historically, about 75 percent of the drums of wastes handled by Rinchem have been for recycling and incineration and about 25 percent for land disposal.

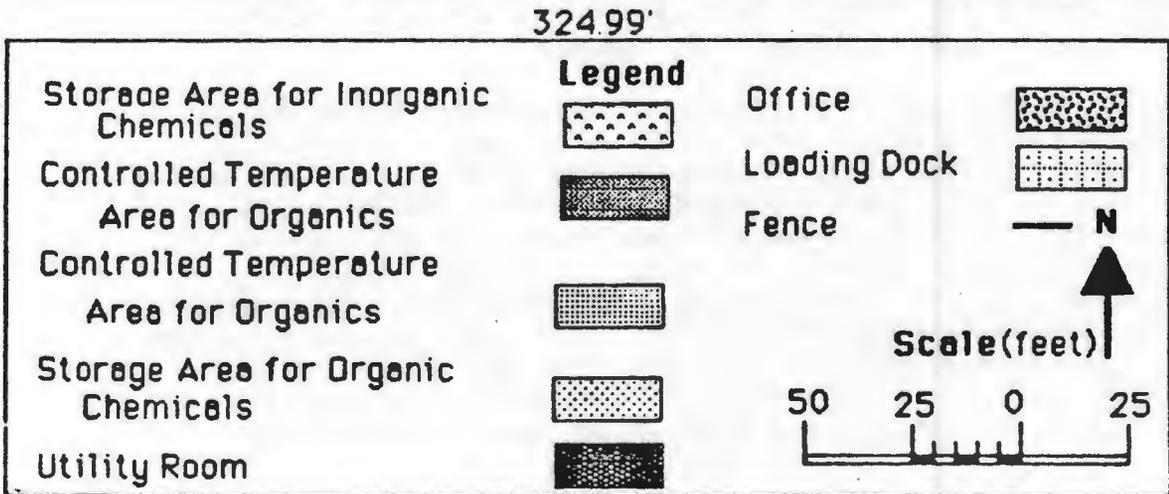
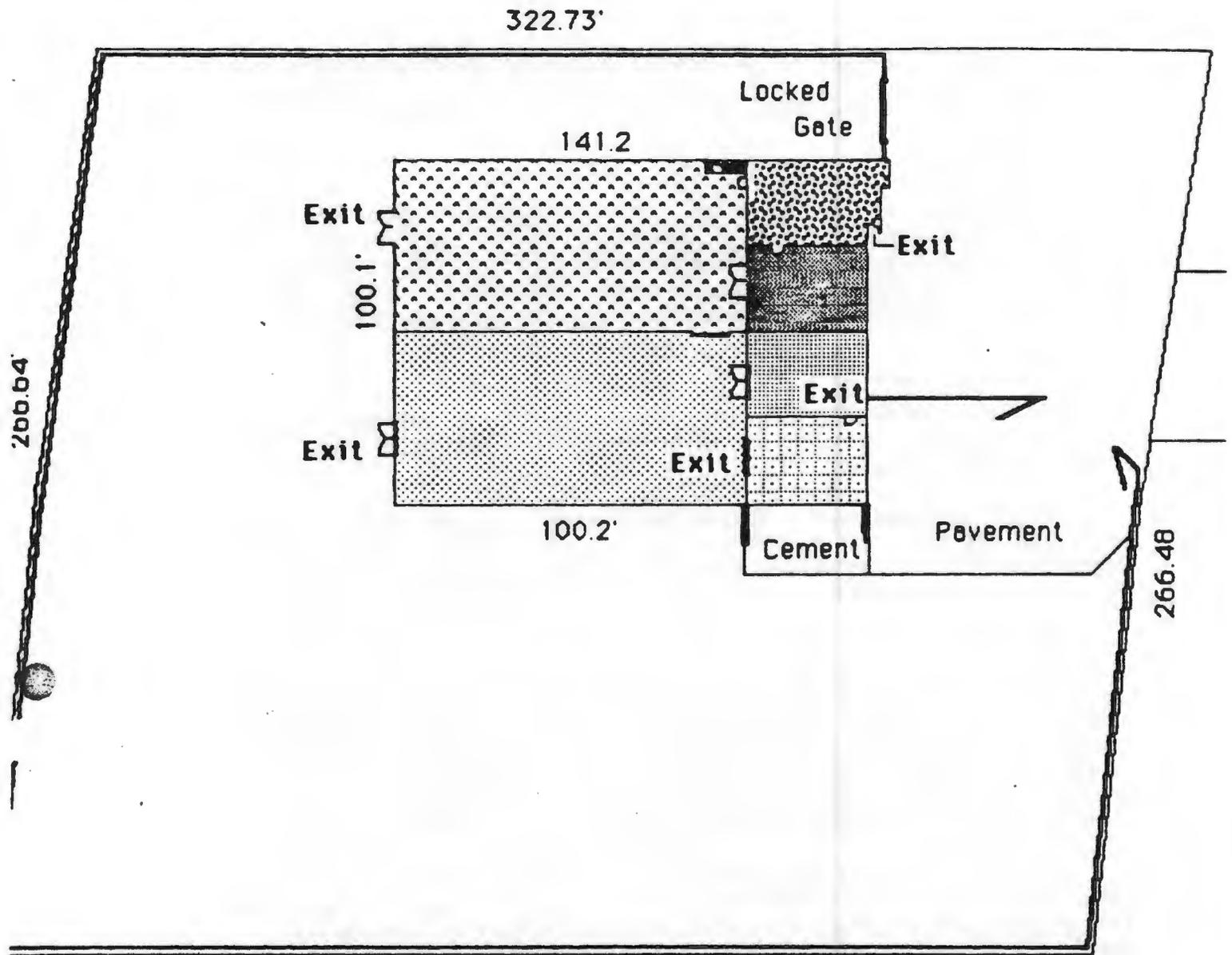


Figure 1 - A Schematic of the Pinchem Company, Inc. Building



Longitude - 106° 37' 43"

Latitude - 35° 08' 39"

Source: U.S. Geological Survey  
 Los Griegos and Alameda Quadrangles  
 7.5 minute series  
 photorevised 1972

Scale



**Note:** No injection wells or withdrawal wells are shown because no wells are known to be used within 1/4 mile of the facility. Several wells have been abandoned because of the lowering of the water table. The information was obtained from well records in the State Engineer's Office. This was also confirmed by a survey of the residential areas surrounding the facility site.

The number of drums of waste generally on the transfer site at any one time is usually in the 10 to 30 drum range. However, on occasion, there have been as many as 100 drums at the facility. The potential exists to accumulate 200 drums in a ten day period.

Under the Part B Application (Ref. 3), Rinchem anticipates storing for a period exceeding 10 days only two types of wastes: organic solvents to be recycled and organic solvents and oils to be incinerated. Rinchem does not accept radioactive materials, or explosives. Materials are not accepted until the final destination and handling of the wastes have been determined.

### 2.3 Identification of Solid Waste Management Units

Seven solid waste management units (SWMUs) have been identified at the Rinchem facility as a result of the PR and VSI. A list of SWMUs is presented in Table 1. All seven SWMUs are proposed for permitting under RCRA.

Table 1

Solid Waste Management Units  
at Rinchem Company, Inc.  
Albuquerque, New Mexico

<u>SWMU NO.</u>	<u>NAME</u>	<u>*RCRA REGULATED SWMU</u>	<u>STATUS</u>
1.	Storage Area for Inorganic Chemicals	No	Active
2.	Controlled-Temperature Storage Area for Inorganic Chemicals	No	Active
3.	Storage Area for Organic Chemicals	No	Active
4.	Controlled-Temperature Storage Area for Organic Chemicals	No	Active
5.	Truck Loading Dock	No	Active
6.	Spill Drain System	No	Active
7.	Spill Collection Tanks	No	Active

\* Proposed for Permitting under RCRA.

### 3.0 ENVIRONMENTAL SETTING

This section of the PR/VSI report includes floodplain and surface water characteristics and geology.

#### 3.1 Floodplain and Surface Water

The facility is not located in an area subject to a 100-year flood (Figure 3). A 100-year flood area is located immediately east of the site. Surface runoff is generally southwestward and is controlled in the area by Alameda Drain to the west, Stotts Lateral to the north, and Gallegos Ditch to the south.

#### 3.2 Geology

The Rinchem facility is located in the alluvial valley of the Rio Grande. The alluvium is comprised of gravels, sands, and silts.

No known faults with displacement in Holocene time are present within three or four miles of the site. If faulting exists in the area, the alluvial deposits have masked the fault line.

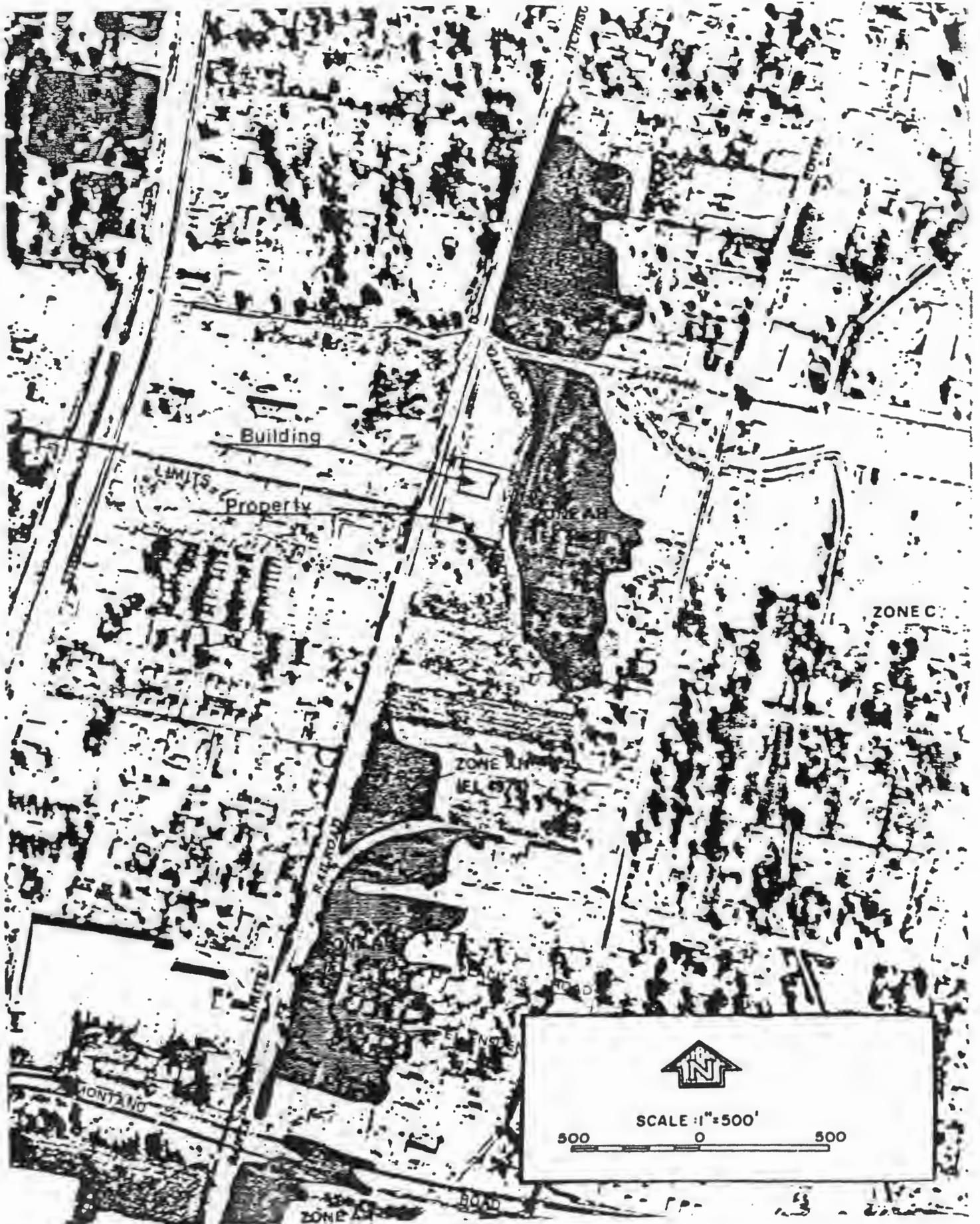


Figure 3 - Location of 100-Year Floodplain

#### 4.0 SOLID WASTE MANAGEMENT UNITS

Seven solid waste management units have been identified during the PR/VSI at the Rinchem Company, Inc. facility. These include four chemical product and hazardous waste storage areas, one truck loading dock, one spill drain system, and the spill collection tanks.

Detailed descriptions of each SWMU identified in the PR and VSI are presented in this section. These descriptions include the SWMU description; dates of operations; wastes managed; and release potential to soil/groundwater, surface waters, and air.

##### 4.1 SWMU #1 Storage Area for Inorganic Chemicals

###### 4.1.1 Information Summary

Unit Description: This active storage unit is specifically designed to warehouse inorganic chemicals and spent inorganic wastes. The warehouse area for the inorganic chemicals is located in the northwest portion of the facility's building and is approximately 100 feet x 50 feet in size. The wall dividing the building into a southern and northern half is a four-hour fire wall. The roll-up door installed in the four-hour fire wall is a three-hour fire-resistive door. The other walls in the facility are two-hour fire walls. The outside doors in exterior walls are 24 gauge steel sectional doors and are manually operated. Floors in the inorganic warehouse are recessed four inches below the stemwall, expansion joints are caulked, and the floor is sealed with epoxy to prevent possible contamination of the soil should a spill occur. The floor slopes to the southeast corner of the storage area where a catch sump is located. The drain is covered with a cast-iron grate. During the VSI, it was observed that the floor had a few minor stains. The catch basin was clean and unstained.

Dates of Operation: The storage area has been in operation since January 1, 1987.

Waste Managed: The Storage Area for Inorganic Chemicals stores pre-packaged inorganic chemicals for distribution and spent inorganic wastes. These chemicals include resins, fiberglass, and miscellaneous industrial chemicals. The wastes include solid waste and aqueous solutions containing heavy metals, alkaline materials, and oil.

###### 4.1.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the warehouse and the controls to prevent spills.
- Surface Water: The potential for release to surface water from this unit is low due to the design of the warehouse and the five foot build up of the soil base under the building.
- Air: The potential for release to the air is low because the containers are all sealed and are in good condition.

- Subsurface Gas: The potential for subsurface gas generation is low due to the construction of the unit prevents the wastes from reaching the soil.

#### 4.2 SWMU #2 Controlled Temperature Storage Area for Inorganic Chemicals

##### 4.2.1 Information Summary:

Unit Description: This active storage unit is specifically designed to warehouse inorganic chemicals for distribution and inorganic wastes that are sensitive to temperature changes. The storage area for the heat-sensitive chemicals is located east of the Storage Area for Inorganic Chemicals (SWMU 1) and is approximately 25 feet x 50 feet in size. A two-hour fire wall separates the two warehouse areas. The southern wall of the unit is a four-hour fire wall. The floor in the heat-sensitive inorganic chemicals warehouse is recessed four inches below the stemwall and slopes to a catch basin. The drain is covered with a cast-iron grate. The expansion joints in the floor are caulked and the floor is sealed with epoxy to prevent possible contamination of the soil should a spill occur. The temperature of the room is controlled within a range of ten degrees fahrenheit. During the VSI, the room was observed to be clean with no staining on the floor or walls.

Dates of Operation: The storage area has been in operation since January 1, 1987.

Wastes Managed: The Controlled Temperature Storage Area for Inorganic Chemicals stores mostly pre-packaged inorganic chemicals and spent inorganic wastes that are sensitive to heat changes. These wastes include solid wastes and aqueous solutions containing heavy metals, alkaline materials, and oil.

##### 4.2.2 Release Potential

- Soil/ Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the warehouse and the controls to prevent spills.
- Surface Water: The potential for release to surface water from this unit is low due to the design of the warehouse and the five foot build up of the soil base under the building.
- Air: The potential for release to the air is low because the containers are all sealed and are in good condition.
- Subsurface Gas: The potential for subsurface gas generation is low due to the construction of the unit prevents the wastes from reaching the soil.

#### 4.3 SWMU #3 Storage Area for Organic Chemicals

##### 4.3.1 Information Summary:

Unit Description: This active storage unit is specifically designed to warehouse organic chemicals for distribution and organic wastes. The storage area for organic chemicals is located in the southwest portion

of the facility's building and is approximately 100 feet x 50 feet in size. The wall dividing the building into a northern and southern half is a four-hour wall. The roll-up door installed in the four-hour fire wall is a three-hour fireresistive door. The other walls in the facility are two-hour fire walls. Floors in the organic chemicals storage area are recessed four inches below the stemwall and are sloped to the northeast corner of the storage area to a drain. The drain is covered with a castiron grate and drains any spills from the warehouse into a concrete sump. During the VSI, the room was observed to be clean, with no stains on the floor or walls. The steel drums were in good condition.

Dates of Operation: The storage area has been in operation since January 1, 1987.

Wastes Managed: The Storage Area for Organic Chemicals stores mostly 55-gallon barrels of organic chemicals and spent organic wastes. These chemicals include spent halogenated and non-halogenated solvents and other combustible organics. The wastes managed by this unit include organic solvents and oils.

#### 4.3.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the warehouse and the controls to prevent spills.
- Surface Water: The potential for release to surface water from this unit is low due to the design of the warehouse and the five foot build up of the soil base under the building.
- Air: The potential for release to the air is low because the containers are all sealed and are in good condition.
- Subsurface Gas: The potential for subsurface gas generation is low due to the construction of the unit prevents the wastes from reaching the soil.

#### 4.4 SWMU #4 Controlled Temperature Storage Area for Organic Chemicals

##### 4.4.1 Information Summary:

Unit Description: This active storage unit is specifically designed to store organic chemicals for distribution and organic wastes that are sensitive to temperature changes. The unit is located east of the Storage Area for Organic Chemicals (SWMU 3) and is approximately 25 feet x 50 feet in size. A two-hour fire wall separates the two warehouse areas. The northern wall of the unit is a four-hour fire wall. The floor of the heat-sensitive organic chemical storage area is recessed four inches below the stemwall and is sloped to the drain which will carry any spills from the warehouse to a concrete sump. A cast-iron grate covers the drain. The temperature of the room is kept constant within a range of ten degrees fahrenheit. During the VSI, the room was observed to be clean with no stains on the floor or walls.

Dates of Operations: The storage area has been in operation since January 1, 1987.

Wastes Managed: The Controlled Temperature Storage Area for Organic Chemicals stores mostly 55-gallon barrels of organic chemicals and spent organic wastes that are sensitive to heat changes. The wastes managed by the unit include organic solvents and oils.

#### 4.4.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the warehouse and the controls to prevent spills.
- Surface Water: The potential for release to surface water from this unit is low due to the design of the warehouse and the five foot build up of the soil base under the building.
- Air: The potential for release to the air is low because the containers are all sealed and are in good condition.
- Subsurface Gas: The potential for subsurface gas generation is low due to the construction of the unit prevents the wastes from reaching the soil.

#### 4.5 SWMU #5 Truck Loading Dock

##### 4.5.1 Information Summary:

Unit Description: The Truck Loading Dock is located in the southeast corner of the facility's warehouse and is east of the Storage Area for Organic Chemicals (SWMU 3) and south of the Controlled Temperature Storage Area for Organic Chemicals (SWMU 4). The dock is constructed of concrete with a metal roof covering it and is approximately 25 feet x 50 feet in size. The floor slopes to the rear to collect any spills on the dock up to 100 gallons. The pad that the trucks park on is constructed of concrete and it slopes toward the dock to contain any spills. During the VSI, a sealed tank containing lacquer thinner was observed on the west side of the truck pad. The tank was setting on concrete blocks, and the blocks appeared to have been nearly knocked from under the tank. The truck pad was observed to contain several inches of rainwater from a recent storm.

Dates of Operations: The Truck Loading Dock has been in operation since January 1, 1987.

Wastes Managed: The Truck Loading Dock manages the loading and unloading of all chemicals and wastes at the facility. Prepackaged inorganic chemicals include resins, fiberglass, and miscellaneous industrial chemicals. Organic chemicals in 55-gallon barrels include halogenated and non-halogenated solvents and other combustible organics. Wastes include organic solvents and oils, solid wastes and aqueous solutions containing heavy metals and alkaline materials.

#### 4.5.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater is low due to the design of the loading dock. The lacquer thinner tank should be moved from the loading dock area to prevent a truck from knocking it from its concrete blocks. The tank should be placed on a permanent foundation with spill controls built around it.
- Surface Water: The potential for release to surface water from this unit is low due to the design of the truck loading dock.
- Air: The potential for release to the air is low because the containers that the chemicals are shipped in are all sealed and in good condition.
- Subsurface Gas: The potential for subsurface gas generation is low due to the construction of the unit prevents the wastes from reaching the soil.

#### 4.6 SWMU #6 Spill Drain System

##### 4.6.1 Information Summary:

Unit Description: Floors on the southern half of the building are sloped to a drain located in the northeast corner of the Storage Area for Organic Chemicals (SWMU 3). The drain consists of concrete construction, a cast-iron grate covering, and a six-inch cast-iron pipe that will carry any spills to the Spill Collection Tank (SWMU 7). At the time of the VSI, the Spill Drain System was clean, unstained, and appeared to be well maintained.

Dates of Operation: The Spill Drain System has been in operation since January 1, 1987.

Wastes Managed: The Spill Drain System manages any spills which may occur in the Storage Area for Organic Chemicals (SWMU 4) and the Controlled Temperature Storage Area for Organic Chemicals (SWMU 5). Any spills which may occur on the Truck Loading Dock (SWMU 6) that is over 100 gallons is designed to flow to the unit. The organic chemicals managed by the unit include halogenated and non-halogenated solvents and other combustible organics. Wastes managed by the unit include spent organic solvents and oils.

##### 4.6.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the warehouse and the controls to prevent spills.
- Surface Water: The potential for release to surface water from this unit is low due to the design of the warehouse and the five foot build up of the soil base under the building.
- Air: The potential for release to the air is low because the containers are all sealed and are in good condition.

- Subsurface Gas: The potential for subsurface gas generation is low due to the construction of the unit prevents the wastes from reaching the soil.

#### 4.7 SWMU #7 Spill Collection Tanks

##### 4.7.1. Information Summary:

Unit Description: Any spills that occur in the southern half of the warehouse are drained to the Spill Collection Tanks located 36 feet west of the building. The in-ground tanks are constructed of concrete and consist of a 500 gallon tank located inside of a 3,790 gallon tank. A six inch cast-iron drain pipe will carry any spill from the Spill Drain System (SWMU 6) to the 500 gallon tank. If the spill is greater than 500 gallons, it will overflow into the 3,790 gallon tank. During the VSI, it was observed that the smaller tank was nearly filled with rainwater. No oily or chemical materials were seen on the water. The larger tank contained about one inch of rainwater.

Dates of Operation: The unit has been in operation since January 1, 1987.

Wastes Managed: The Spill Collection Tanks manage any spills which may occur in the Storage Area for Organic Chemicals (SWMU 4) and the Controlled Temperature Storage Area for Organic Chemicals (SWMU 5). Any spills over 100 gallons that may occur on the Truck Loading Dock (SWMU 6) is designed to flow to the unit. The organic chemicals managed by the unit include halogenated and non-halogenated solvents and other combustible organics. Waste managed by the unit include spent organic solvents and oils.

##### 4.7.2 Release Potential

- Soil/Groundwater: The potential for release to soil and groundwater from this unit is low due to the design of the warehouse and the controls to prevent spills.
- Surface Water: The potential for release to surface water from this unit is low due to the design of the warehouse and the five foot build up of the soil base under the building.
- Air: The potential for release to the air is low because the containers are all sealed and are in good condition.
- Subsurface Gas: The potential for subsurface gas generation is low due to the construction of the unit prevents the wastes from reaching the soil.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

SWMU #1 - Storage Area for Inorganic Chemicals

Suggested Action: No further action.

Reasons: The unit is designed for chemical product and waste storage. The floors are recessed four inches below the stemwall to contain any spills. Expansion joints are caulked and the floor is sealed with epoxy. The floor is sloped to a catch basin. During the VSI in August 1987, the floors were clean with very minor staining and the catch basin had no staining.

SWMU #2 Controlled Temperature Storage Area for Inorganic Chemicals

Suggested Action: No further action.

Reasons: The unit is designed for chemical product and waste storage. The floors are recessed four inches below the stemwall to contain any spills. Expansion joints are caulked and the floor is sealed with epoxy. The floor is sloped to a catch basin. During the August 1987 VSI, the floors and catch basin were clean with no staining. The room is temperature controlled to a range of ten degrees fahrenheit.

SWMU #3 Storage Area for Organic Chemicals

Suggested Action: No further action.

Reasons: The unit is designed for organic chemical product and waste storage. The floors are recessed four inches below the stemwall to contain any spills. Expansion joints are caulked and the floor is sealed with epoxy. The floor is sloped to the Spill Drain System (SWMU 6). During the August 1987 VSI, the floor was clean with no staining and the 55-gallon barrels were in good condition.

SWMU #4 Controlled Temperature Storage Area for Organic Chemicals

Suggested Action: No further action.

Reasons: The unit is designed for organic chemical product and waste storage. The floors are recessed four inches below the stemwall to contain any spills. Expansion joints are caulked and the floor is sealed with epoxy. The floor is sloped to the Spill Drain (SWMU 6). During the August 1987 VSI, the floor was clean with no staining.

SWMU #5 Truck Loading Dock

Suggested Action: The sealed tank containing lacquer thinner located on the truck pad should be moved and set on a permanent foundation with spill controls. The truck pad needs better control of rainwater runoff.

Reasons: The tank is in a location where it can be hit by a truck and toppled onto its side possibly spilling its contents. During the August 1987 VSI, the concrete blocks it sets on appeared to have been nearly knocked from under the tank. The truck pad contained several

inches of rainwater. If a spill occurred while the pad was filled with water, the spill may be released to the soil.

#### SWMU #6 Spill Drain System

Suggested Action: No further action.

Reasons: The drain system was clean, unstained, and appeared to be well maintained.

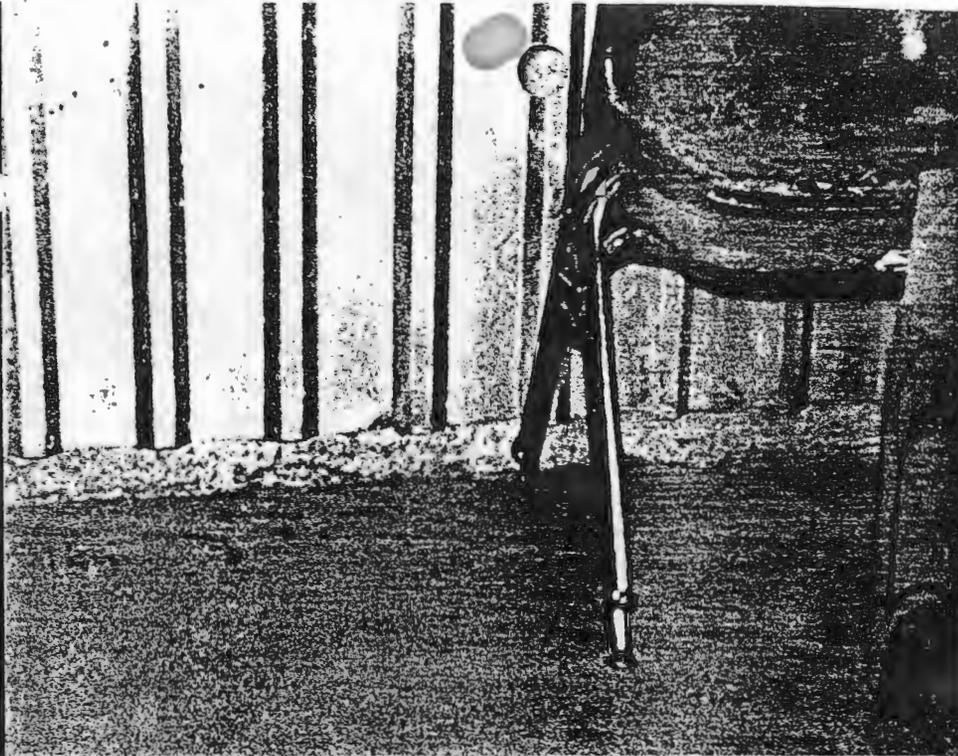
#### SWMU #7 Spill Collection Tanks

Suggested Action: Regrade the ground around the tanks to ascertain that rainwater will not flow into the unit. The drain pipe from the warehouse should be rerouted away from the tanks. No staining was observed on the tank or floating on the water.

Reasons: During the August 1987 VSI, the 500-gallon tank was nearly filled with rainwater and the larger tank had about an inch of water in it. Surface water from a recent rainstorm appeared to have flowed into the tanks. It may have come from the drain pipe from the warehouse.

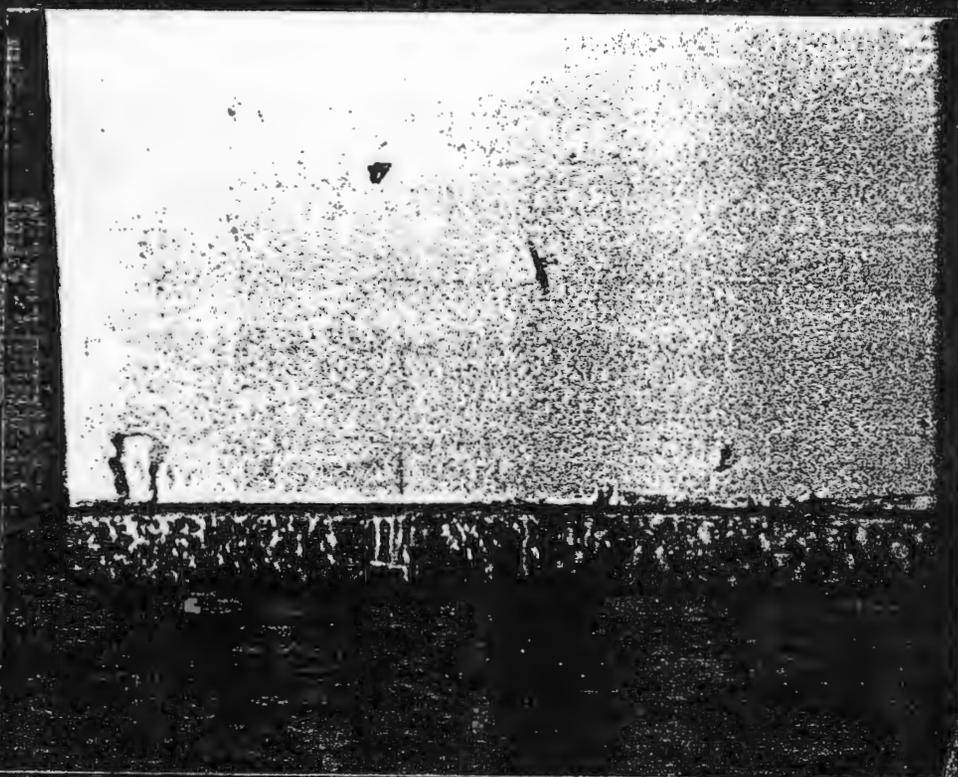
## 6.0 REFERENCES

1. U.S. EPA, RCRA Facility Assessment Guidance, 1986.
2. National RCRA Corrective Action Strategy, Memorandum from J. Winston Porter, Assistant Administrator, OSWER, to Hazardous Waste Division Directors, Region I-X, dated October 14, 1986.
3. Resource Conservation and Recovery Act (RCRA)-Part B Application-to Hazardous Waste Office, Environmental Improvement Division. The Health and Environmental Department of the State of New Mexico, August 5, 1986.



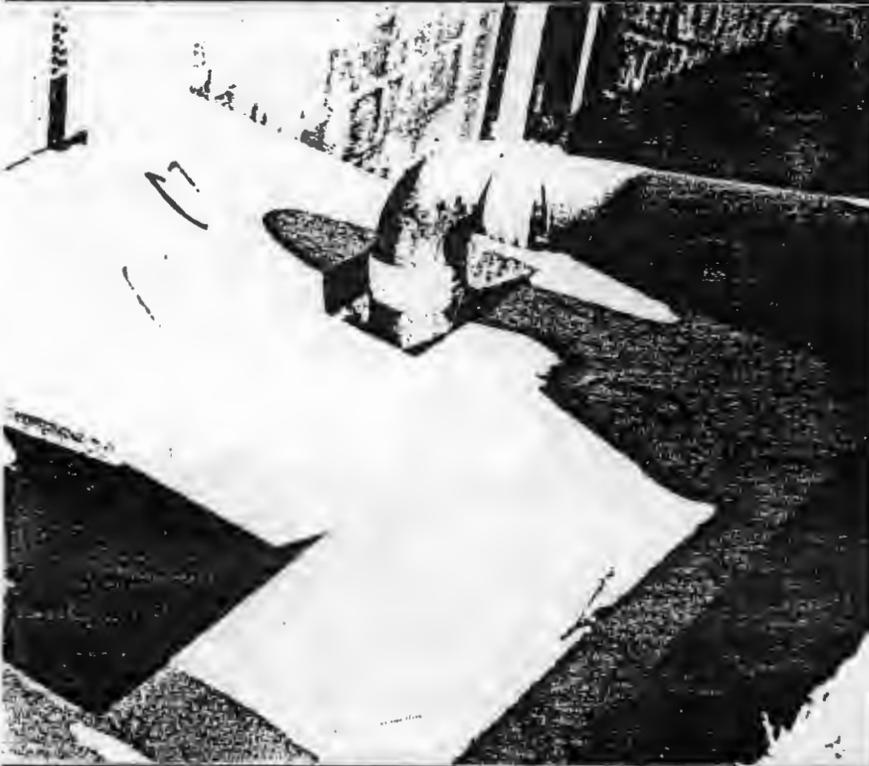
OFFICIAL PHOTOGRAPH  
 U.S. ENVIRONMENTAL PROTECTION AGENCY  
 .....

SUBJECT: Rinchem Company, Inc.  
 LOCATION: Sum 4 #1 Recessed  
at exterior wall  
 CITY: Albuquerque COUNTY: \_\_\_\_\_ STATE: NM  
 DATE: 8/23/87 TIME: \_\_\_\_\_  
 WEATHER: (SUN) (HAZE) (CLOUDY) (RAIN) (SNOW)  
 PHOTOGRAPHER (Sig.) Marc Sides  
 WITNESS: Bobby Williams  
 CAMERA: \_\_\_\_\_  
 FILM TYPE: \_\_\_\_\_ ASA: \_\_\_\_\_ T: 1/ \_\_\_\_\_ f: \_\_\_\_\_  
 NEGATIVE LOCATION: \_\_\_\_\_ FILE #: \_\_\_\_\_  
 PROCESSED BY: \_\_\_\_\_  
 PHOTO #: \_\_\_\_\_ of \_\_\_\_\_



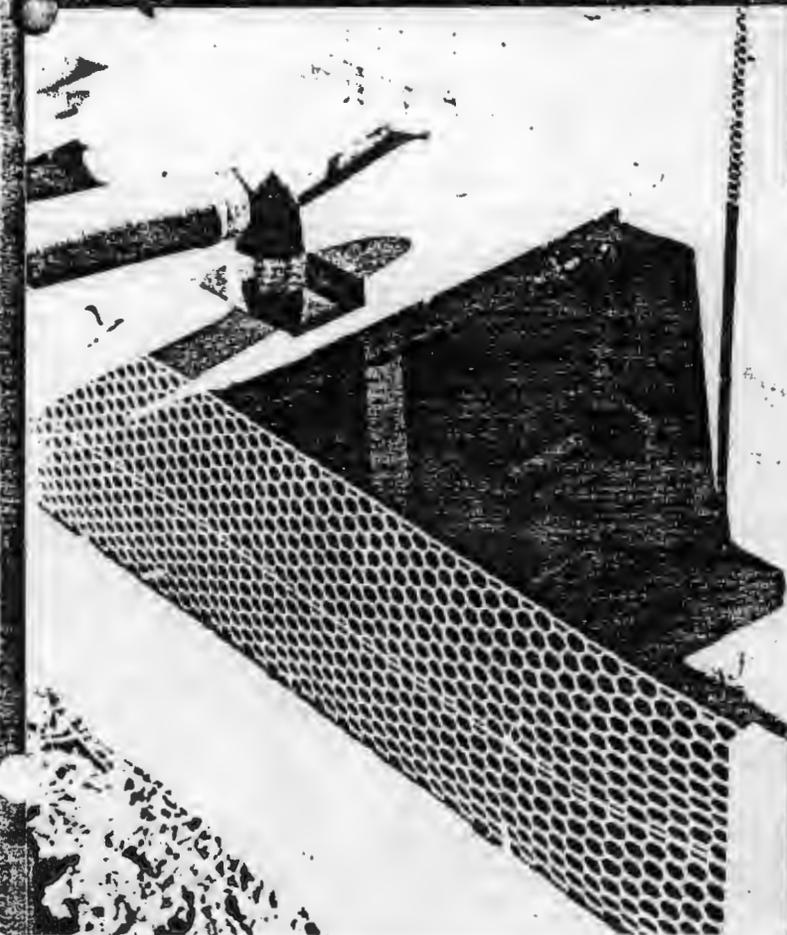
OFFICIAL PHOTOGRAPH  
 U.S. ENVIRONMENTAL PROTECTION AGENCY  
 .....

SUBJECT: Rinchem Company, Inc.  
 LOCATION: Sum 4 #1 Recessed  
at interior wall  
 CITY: Albuquerque COUNTY: \_\_\_\_\_ STATE: NM  
 DATE: 8/23/87 TIME: \_\_\_\_\_  
 WEATHER: (SUN) (HAZE) (CLOUDY) (RAIN) (SNOW)  
 PHOTOGRAPHER (Sig.) Marc Sides  
 WITNESS: Bobby Williams  
 CAMERA: \_\_\_\_\_  
 FILM TYPE: \_\_\_\_\_ ASA: \_\_\_\_\_ T: 1/ \_\_\_\_\_ f: \_\_\_\_\_  
 NEGATIVE LOCATION: \_\_\_\_\_ FILE #: \_\_\_\_\_  
 PROCESSED BY: \_\_\_\_\_  
 PHOTO #: \_\_\_\_\_ of \_\_\_\_\_



OFFICIAL PHOTOGRAPH  
 U.S. ENVIRONMENTAL PROTECTION AGENCY  
 .....

SUBJECT: Rinchem Company, Inc  
 LOCATION: SWMU #7 500 gallon  
Tank (Note water in it)  
 CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_ STATE: \_\_\_\_\_  
 DATE: 8/28/87 TIME: \_\_\_\_\_  
 WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]  
 PHOTOGRAPHER (Sig.) \_\_\_\_\_  
 WITNESS: \_\_\_\_\_  
 CAMERA: \_\_\_\_\_  
 FILM TYPE: \_\_\_\_\_ ASA: \_\_\_\_\_ T: 1/ \_\_\_\_\_ f: \_\_\_\_\_  
 NEGATIVE LOCATION: \_\_\_\_\_ FILE #: \_\_\_\_\_  
 PROCESSED BY: \_\_\_\_\_  
 PHOTO #: \_\_\_\_\_ of \_\_\_\_\_



OFFICIAL PHOTOGRAPH  
 U.S. ENVIRONMENTAL PROTECTION AGENCY  
 .....

SUBJECT: Rinchem Company, Inc  
 LOCATION: SWMU #7 3790 gal  
Tank (Note water in it)  
 CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_ STATE: \_\_\_\_\_  
 DATE: 8/28/87 TIME: \_\_\_\_\_  
 WEATHER: [SUN] [HAZE] [CLOUDY] [RAIN] [SNOW]  
 PHOTOGRAPHER (Sig.) Marc Sides  
 WITNESS: Bobby Williams  
 CAMERA: \_\_\_\_\_  
 FILM TYPE: \_\_\_\_\_ ASA: \_\_\_\_\_ T: 1/ \_\_\_\_\_ f: \_\_\_\_\_  
 NEGATIVE LOCATION: \_\_\_\_\_ FILE #: \_\_\_\_\_  
 PROCESSED BY: \_\_\_\_\_  
 PHOTO #: \_\_\_\_\_ of \_\_\_\_\_



OFFICIAL PHOTOGRAPH

U.S. ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Rivchem Company, Inc  
LOCATION: Monitoring Well (Mr  
Moore replacing cap)  
CITY: \_\_\_\_\_ COUNTY: \_\_\_\_\_ STATE: \_\_\_\_\_  
DATE: 8/28/87 TIME: \_\_\_\_\_  
WEATHER: (SUN) (HAZE) (CLOUDY) (RAIN) (SNOW)  
PHOTOGRAPHER (Sig.) Marc Sides  
WITNESS: Bobby Williams  
CAMERA: \_\_\_\_\_  
FILM TYPE: \_\_\_\_\_ ASA: \_\_\_\_\_ T: 1/ \_\_\_\_\_ f: \_\_\_\_\_  
NEGATIVE LOCATION: \_\_\_\_\_ FILE #: \_\_\_\_\_  
PROCESSED BY: \_\_\_\_\_  
PHOTO #: \_\_\_\_\_ of \_\_\_\_\_



MW- # →  
broken off

Res # 11

West side  
between  
Chemical  
Plant  
and Refinery

MW  
No cap

Kinchel Inc 0900 arrived  
Albuquerque, N.M. at facility,

Marc Sides - EPA 1125 departed  
Bobby Williams - EPA facility,  
Bill Moore - Kinchem  
Elizabeth Gordon - NMEID

Picture #1 grates over drain systems  
systems are separated  
segregated

Picture #2 Collection sump for spills  
note drainage for rainwater  
appears to slope toward collection  
pit

Picture #4 Inner tank holds about 500  
Picture #5 gallons; outer tank about  
4,000 gallons. Note inner  
tank nearly full of rain  
water

Picture #3 Truck  
Picture #6 Monitoring well - not capped  
Picture #7 Monitoring well - Mr. Moore capping  
well. Note fence has been cut  
by power lines.

Picture #8 Dredging, storing chemicals  
note erosion of berm

Picture #9 4" concrete wall around storage  
Picture #10 building. Wall double walled.  
Picture #11 so that splash will not  
leak outside the building

Prior to issuing permit, EPA  
may need to ascertain that the  
sump tank is above ground level  
to assure that rain water is not  
drained into it.

The facility had only one mon-  
itoring well. When VSI was conduct-  
ed, the well was not capped. The  
leachate thinning tank is located  
at the back loading dock, and sits  
on 3 concrete blocks per leg. Under  
one of the legs, the blocks were  
loosely knocked from under the  
leg creating an unstable condition.

Departed facility @ 1125

~~No further comments~~

Bethy J. Williams