

Rinchem
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



GARY E. JOHNSON
GOVERNOR



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

August 8, 1996

Scott Gariss, Operations Coordinator
Rinchem Company, Inc.
6133 Edith Blvd., N.E.
Albuquerque, New Mexico 87107

Dear Mr. Gariss:

The Hazardous and Radioactive Materials Bureau (HRMB) has reviewed the U.S. Environmental Protection Agency (EPA) memorandum dated October 30, 1990 concerning EPA's interpretation of transfer facility requirements. Based on review of this memo, HRMB agrees that a permitted storage facility can under certain conditions handle hazardous waste as a transfer facility. Rinchem is therefore exempt from the biennial reporting requirements concerning waste that is shipped via Rinchem to the designated facility identified on the manifest provided the transfer facility requirements are met and that Rinchem is not the designated facility. All hazardous waste manifested to Rinchem as the designated facility must still meet all applicable permit requirements to include biennial reporting requirements. Modification language to your existing permit will be initiated by the RCRA Permits Management Program to clarify this situation.

Thank you for your cooperation in this matter. If you have any questions, please contact me at (505) 827-1557.

Sincerely,

A handwritten signature in cursive script that reads "Benito Garcia".

Benito Garcia
Chief
Hazardous and Radioactive Materials Bureau

BJG:CGM:cm

xc: Barbara Hoditschek, Program Manager, RCRA Permits Management
Coby Muckelroy, Program Manager, RCRA Inspection/Enforcement
Anna Walker, Management Analyst