

B R I E F I N G   S H E E T

September 22, 1997

PRESENT LOCATION

RINCHEM COMPANY, INC.  
6133 EDITH BLVD. N.E.  
ALBUQUERQUE, NEW MEXICO  
NMD002208627

COPY

The Rinchem Company, Inc. is presently seeking renewal of their existing Resource Conservation and Recovery Act Operating Permit to continue the operation of their permitted Storage Facility. Their existing permit will expire in January 1998.

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- 09/19/97 The Hazardous and Radioactive Materials Bureau (HRMB) is presently reviewing Rinchem Company, Inc. (RNCM) Part B Hazardous Waste Application for technical adequacy.
  - 02/24/97 State of New Mexico Department of Public Safety completed their background investigation on RNCM.
  - 11/07/96 RNCM responded to HRMB's request for additional information on the Technical Review Notice of Deficiency.
  - 08/22/96 HRMB requested by letter that RNCM complete and submit required Disclosure Statement information.
  - 08/08/96 HRMB conducted a phonecon with RNCM to request additional information to their response to our Technical Review Notice of Deficiency.
  - 08/08/96 HRMB submitted their approval by letter that RNCM was not required to submit Biennial Report(s).
  - 07/29/96 RNCM requested by letter that HRMB reconsider their position that RNCM must submit their Biennial Report Forms as required by RNCM's RCRA Operating Permit and by HWMR-4, Section 203.C.3.a incorporating 40 CFR §264.75.
  - 07/01/96 RNCM responded to HRMB's Technical Review Notice of Deficiency, dated 04/24/96.
  - 04/24/96 HRMB issued a Technical Review Notice of Deficiency to RNCM.
  - 12/28/95 RNCM submitted payment of their fee assessment for their Hazardous Waste Facility Permit Reapplication.

- 09/07/95 RNCM was issued a Letter of Violation by the RCRA Inspection/Enforcement Program for "failure to maintain aisle space in a manner to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency." A violation of 20 NMAC 4.1.501 incorporating 40 CFR §264.35.
  - 05/01/95 HRMB issued an Administrative Review Notice of Deficiency to RNCM.
  - 02/07/95 RNCM submitted their Parts A and B Hazardous Waste Permit Reapplication.
  - 01/08/88 RNCM issued a Hazardous Waste Facility Operating Permit to operate a hazardous waste storage facility.
  - 05/11/87 EPA Record of Communication note, ID number for 6133 Edith facility NMD002208627.
  - 03/ /87 Part B determined to be complete, Permit being drafted.
  - 08/08/86 RNCM submitted Part B application for new hazardous waste management; container storage facility at 6133 Edith.
  - 12/ /83 RNCM moved to 6133 Edith as Transporter Storage Facility (new chemical warehouse operation and transfer station).
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PREVIOUS LOCATION

"OLD RINCHEM SITE"  
5001 EDITH BLVD. N.E.  
ALBUQUERQUE, NEW MEXICO  
NMD085267961

SITE HISTORY:

Rinchem Company, Inc. (RNCM) leased the site and operated a hazardous waste transfer and holding station from 1979 until 1983. RNCM 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 at the RNCM 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 was sent to RNCM 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 RNCM 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 RNCM facility while they were operating the hazardous waste transporting and holding facility.

CONCERNS:

Concentrations of contaminants found in the shallow, on-site monitor wells exceed drinking water MCL's. NMED persuaded EPA to require RNCM 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 were scheduled to be installed during the first week of May, 1995.

It is likely that EPA will determine that the site will not be placed on the NPL based on the results of the Risk Assessment that was conducted during the Spring of 1995. If this is the case, then what enforcement actions should NMED take to have the site characterized and remediated? It is possible that the site could be handled under the New Mexico Water Quality Control Commission (WQCC) regulations through an Administrative Order on Consent and further voluntary cleanups.

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- 01/30/95 EPA required RNCM to install two (2) additional monitor 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.

- 12/ /94 RNCM installed passive soil gas probes at the site, and collected surface soil samples.
- 10/14/92 The "Old RNCM Site" was proposed for inclusion on the National Priorities List (NPL).
- 12/ /89 RCRA Enforcement Branch response to Superfund concerning 5001 Edith Avenue facility: facility lost Interim Status 1983; extent of contamination at abandoned site could be determined under 3013 RCRA; Superfund may be best way to address release at site; no current RCRA enforcement actions against facility.
- 03/ /85 Clean facility, no deficiencies noted by NMEID Monitoring Enforcement log.
- 02/16/84 RCRA Enforcement comments indicate Closure and Financial Assurance was satisfactory.
- 04/07/83 EPA issued Loss Of Interim Status (LOIS) action; facility will operate as a transporter with no more than 10 day storage.
- 01/25/83 EPA inspected the container facility, determined that facility had ceased TSD operation and met all the requirements of Notice Of Violation (NOV) dated 11/09/82.
- 01/19/83 RNCM submitted Closure Plan.
- 01/19/83 RNCM resolved violations of NOV; facility ceased TSD operations.
- 10/26/82 EPA issued NOV for Class III violations; improper security provisions, insufficient labeling of containers, no written waste analysis plan, etc. EPA requested submittal of an approved Closure Plan.
- 09/30/82 RNCM gave EPA notice that RNCM would cease to be a TSD facility.
- 08/10/82 EPA conditions of operation during Interim Status; RNCM can handle only hazardous waste with EPA hazardous waste numbers D001 and D002.
- 07/08/82 RNCM declined request; RNCM would cease operation or ship all drums within 10 days.
- 03/31/82 EPA requested Part B be submitted.

- 12/31/81 EPA Annual Hazardous Waste Report identified: K086; U031; F002; U154; D001; D006; F001; U226; F003; F005; F006; which included spent Perchloethylene; Butyl Alcohol; spent Trichloroethane; Methanol; Butanol; Phosphate compounds; Aqueous Cadmium; and mixed solvents.
- 12/ /80 EPA inspection determined that drums were kept for more than 10 days.