

# MEMORANDUM

To: Dr. Ed Kelley, Director WWMD *ER*

Through: Benito J. Garcia, Chief HRMB *BW*

Through: Dr. Robert "Stu" Dinwiddie, Program Manager RPMP *RD*

Through: Jerry Bober, Supervisor RPMP/DOD *JB*

From: Phillip Solano, Water Resource Specialist II *PS*

From: Cornelius Amindyas, Environmental Specialist *CA*

Date: September 24, 1997

Subject: Proposed Draft Fee Regulations

On September 23, 1997, at 10:15 a.m., the New Mexico Environment Department Hazardous and Radioactive Materials Bureau (HRMB) met with Rinchem Company, Inc. (RNCM) representatives to discuss the facility's concerns regarding HRMB's proposed Draft Hazardous Waste Fee Regulations that were submitted to the facilities for comment, letter dated August 15, 1997. Those in attendance at the meeting were:

## RINCHEM COMPANY, INC.

Jeffery A. Kubisak, Director of Field Services  
John Fitzsimons, C.E.S./Albuquerque West Facility Manager

## HAZARDOUS & RADIOACTIVE MATERIALS BUREAU

Dr. Robert "Stu" Dinwiddie, Program Manager RPMP  
Cornelius Amindyas, Environmental Specialist RPMP/DOD  
Phillip Solano, Water Resource Specialist RPMP/DOD

Originally, the Annual Fee for a small hazardous waste management (HWM) activity was assessed \$90,000 per 1 (one) Full Time Employee (FTE). Dr. Dinwiddie stated to RNCM that the proposed fees were being revised, and that the new revision would substantially lower the annual fee for a small HWM activity from \$90,000 to approximately \$12,000 dependant upon the number of corrective action units the facility possessed.

Upon hearing this comment the general consensus was that the RNCM representatives were receptive to this proposal, and they further remarked that we (HRMB) had taken all their "thunder" from their proposed agenda items. RNCM raised a concern in that would a facility undergoing final closure be assessed the annual fee should the closure period (i.e., a 180 days) carry them over into the next year's billing cycle. Dr. Dinwiddie replied that this concern would be addressed and incorporated into the final version of the fee regulations. The meeting ended on a positive note, and it appeared that all parties were satisfied with the resultant meeting's discussion.