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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 2, 1997

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

RE: REQUEST FOR SUPPLEMENTARY INFORMATION ON PERMIT RENEWAL APPLICATION
EPA ID NO. NMD002208627

Dear Mr. Moore:

The New Mexico Environment Department (**NMED**) Hazardous and Radioactive Materials Bureau (**HRMB**) RCRA Permits Management Program has completed review of the Rinchem Company Inc.'s,(**RCI**'s) response to HRMB's May 2, 1995 notice of deficiency on the Facility Permit renewal application.

The enclosed Attachment lists the required information necessary for NMED to declare the application technically adequate and to commence drafting the permit text. The information requested must be submitted to HRMB within thirty (**30**) calendar days from the date you receive this letter. Please present the required information in two hard copies and on a 3.5" diskette compatible with Word Perfect 5.2. Failure to submit the required information in this designated time may result in issuance of a Notice of Intent **(NOI)** to deny a Permit.

If you have any questions, please contact Cornelius Amindyas of my staff at (505) 827-1561.

Sincerely yours,

Robert S. (Stu) Dinwiddie, Ph.D., Manager
RCRA Permits Management Program
Hazardous and Radioactive Materials Bureau

Enclosure

cc: Benito Garcia, Chief, HRMB
David Neleigh, EPA Region VI
Cornelius Amindyas, HRMB

FILE: RCI Red 97
TRACK: RCI 12/2/97, RCI, HRMB/CA, RE, Red 97

ATTACHMENT A

REQUEST FOR SUPPLEMENTARY INFORMATION:

December 3, 1997

The New Mexico Environment Department (**NMED**) Hazardous and Radioactive Materials Bureau (**HRMB**) has completed review of Rinchem Company Inc.'s (**RCI's**) response to HRMB's May 2, 1995 notice of deficiency on the Facility Permit renewal application. After reviewing the subject response to the NOD, HRMB has determined that RCI must address the following issues satisfactorily before the application can be declared technically adequate, and a draft permit developed:

A) WASTE ANALYSIS PLAN as required by 20 NMAC 4.1.500 incorporating 40 CFR §264.13

1. *Waste Analysis Plan, pages 2-7*:

   RINCHEM never mentions if chemical analyses (EPA SW-846 methods) will be performed in-house or in a contracted laboratory. Although quality assurance/quality control (**QA/QC**) procedures are mentioned on page 4, the details are not presented. RINCHEM must therefore present the QA/QC that will be applied during sample management at closure.

2. *Waste Analysis Plan, page 4, paragraph 1*:

   RINCHEM mentions that the HAZCAT CHEMICAL IDENTIFICATION SYSTEM will be used to characterize unidentified wastes. What parameters will be tested by the HAZCAT procedures, and what is the rationale for using a specific parameter?

3. *Waste Analysis Plan, Recordkeeping:*

   The New Mexico Hazardous Waste Management Regulations 20 NMAC 4.1,500 incorporating 40 CFR § 264.113(b)(1) state that the owner or operator must keep a written waste analysis plan which specifies the parameters for which each hazardous waste must be analyzed and the rationale for the selection of these parameters. This was not done in RINCHEM's permit application. Rinchem must fulfill this requirement, and indicate where a copy of the operating record, including the Waste Analysis Plan will be kept in accordance with the above requirement, and to comply with 20 NMAC 4.1.500 incorporating 40 CFR §264.73(b)(3).

4. *Waste Analysis Plan, page 4, paragraph 3:*

   "The test methods that will be used are described in the most current version of EPA's "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846" or compatible methods."

   How specific will the choice of analytical methods be? Will RINCHEM test for all potential hazardous constituents? RINCHEM must provide details on how it will choose the appropriate analyses to identify wastes it plans to manage, since this requirement was not addressed in the reapplication text dated February 10, 1995.

B) CLOSURE PLAN as required by 20 NMAC 4.1.500 incorporating 40 CFR §264.112 through §264.117.

RINCHEM must provide a comprehensive Closure Plan that contains information that describes how each hazardous waste management unit will be closed, including a description of the waste inventory, procedures for decontamination, groundwater monitoring, and removal of contaminated soil as required by *20 NMAC 4.1.500 incorporating 40 CFR §264*.112(b)(1-5). In addition, the following information must be included in the subject plan:

1. *Closure Plan, Page 50, paragraph 3:*

"...a soil gas survey or the technology being used at the time to detect organic substances will be conducted. The survey will be performed in storage areas C and D, on the docks, in the sumps and any other areas where there is known to have been a spill of any organic solvent or waste."

a) Since there is no sampling plan available to determine if this will be an adequate survey, RINCHEM must provide a detailed sampling and analysis plan for closure as per 20 NMAC 4.1.500 incorporating 40 CFR §264.112(b)(4) and (5).

b) Provide a description of what detection equipment will be used, how halogenated organics will be detected, whether the sampling will be passive or extractive, and how many samples will be taken. Present the screening action levels, and how they will be chosen.

c) Provide a map indicating closure sample locations. Describe the sample collection procedures.

2. *Closure Plan, Page 50, Paragraph 4:*

"In the rooms where corrosives have been stored, concrete corings will be done at several places in each storage area. A pH test will be conducted on each concrete sample and the soil beneath to determine if further investigation is warranted."

a) Explain how pH will be determined in the concrete and soil, how many samples will be taken, and how RINCHEM plans to achieve clean closure. Include information on how the soil will be tested for organic vapors in this area as well.

b) Provide information on the natural 'background' soil pH, and whether or not, RINCHEM plans to propose a screening action level for pH.

c) Provide criteria that RINCHEM plans to use to determine if the soil is clean. The samples must be tested for possible contaminants in the corrosives, such as metals.

3. *Closure Plan, page 50, paragraph 5:*

"..in case the analysis described above reveals any areas of suspect contamination, concrete and soil will be excavated in the area of concern, analyzed and disposed of in the appropriate manner."

a) As per 20 NMAC 4.1,500 incorporating 40 CFR § 264.112(b)(4), RINCHEM must provide a detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during partial and final closure, including, but not limited to, procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and the criteria for determining the extent of decontamination required to satisfy the closure performance standard contained in 20 NMAC 4.1,500 incorporating 40 CFR §264.112(b) (5).). There is no such plan provided in response to the NOD previously sent to RINCHEM by HRMB.

b) Provide a detailed description of other activities necessary during the closure period, including, but not limited to, ground water monitoring, leachate collection, and run-on and run-off control, in compliance with of 20 NMAC 4.1.500 incorporating 40 CFR §264.112(b)(5). RINCHEM did not provide this information in its permit application.

4. *Closure Plan, pages 49-53:*

Quality assurance and quality control (QA/QC) procedures were never discussed for field sampling or screening. The QA/QC measures must be addressed in the complete sampling and analysis plan that RINCHEM is required to submit for its closure plan in the part B permit application. Include a complete site map of the facility with possible sampling locations marked on it.

5. RINCHEM must include in the permit application a sample copy of the waste profile sheet its customers fill out.

C) *Closure; Time Allowed for Closure:*

Provide information about the time needed for closure (from the commencement to completion), in accordance with the requirements contained in 20 NMAC 4.1.500 incorporating 40 CFR §264.113.

D) *Disposal or Decontamination of Equipment, Structures, and Soils*:

Provide information on how during partial and final closure periods contaminated equipment, structures, and soils will be disposed of or decontaminated, in order to fulfill the requirements of 20 NMAC 4.1.500 incorporating 40 CFR §264.114.

E) Certification of Closure:

Describe how RINCHEM will confirm through certification by a New mexico registered independent Engineer, that the hazardous waste management units (at

RINCHEM) have been closed in accordance with the specifications contained in the approved Closure Plan, as required by 20 NMAC 4.1.500 incorporating 40 CFR §264.115. Provide a survey plat of the facility to the local zoning authority, in compliance with all applicable standards of 20 NMAC 4.1.500 incorporating 40 CFR §264.116.

F) Post-Closure Care and Use of Property:

Submit a Post-Closure Care Plan for the units comprising the facility, and information on subsequent use of the property in accordance with 20 NMAC 4.1.500 incorporating 40 CFR §264.117.

G) Risk Analysis:

Provide a Risk Analysis that includes, and considers the following issues:

1. Provide a description of the existing air quality, other sources of contamination and the potential cumulative impact on human health and the environment. Present an estimate of the individual excess lifetime cancer risk.

2. Present an outline of the potential for health risks caused by human exposure to the hazardous waste constituents managed by RINCHEM;

3. Submit an account of potential damage to domestic animals, wildlife, vegetation, and physical structures caused by exposure to hazardous waste constituents from the RINCHEM Facility. Discuss other exposure pathways such as prey consumption by carnivores, and water ingestion pathways;

4. Describe any sensitive receptors within a 2 kilometer radius, and an estimate of exposed individuals living and/or working on the RINCHEM premises, and in the surrounding metropolitan community;

5. Show calculations of the lifetime cancer risk as a function of downwind concentrations, unit risk value, and exposure duration;

6. Give a detailed network of receptor points to permit the estimation and identification of receptor points that are exposed to maximum contaminant concentrations; and

7. Provide a detailed estimation of the exposed population. The non-inhalation pathways (ingestion and dermal) must be addressed using appropriate pathway exposure models, and what measures will be taken to minimize release of hazardous waste to the environmental media.