



COMPANY, INC.

6133 EDITH BOULEVARD NE
ALBUQUERQUE, NM 87107
PHONE (505) 345-3655



February 5, 1999

Dr. Robert S. Dinwiddie
Hazardous and Radioactive Materials Bureau
NMED - State of New Mexico
P.O. Box 26110
Santa Fe, NM 87502

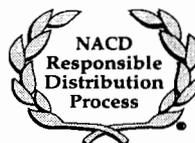
RE: Rinchem Company, Inc. Response Requested on Number of Corrective Action Units.

Dear Dr. Dinwiddie:

Rinchem Company, Inc. currently operates a Hazardous Waste Storage Facility under a RCRA permit. Rinchem should be assigned one Solid Waste Management Unit (SWMU) during the Annual Unit Audit. Our original permit identified one facility, where we conducted all hazardous waste activities in one contiguous area of a few thousand square feet. This area was engineered to allow us to perform hazardous waste storage activities with environmental protection. The permit, however, inappropriately divides the facility into seven SWMU.

We currently have a RCRA Hazardous Waste Storage Facility permit renewal application into NMED for review. This reapplication was submitted in February 1995. Our facility was visited on Friday, 1/29/99, by Stephen Pullen and Cornelius Amyndias of the NMED RCRA Technical Compliance Program, to gain a more thorough understanding of our hazardous waste operations. Based on our conversations with them during that visit, NMED indicated that Rinchem's SWMU were not defined the same way as similar New Mexico RCRA regulated facilities. Other similar storage facilities group such contiguous activities into one SWMU.

Based on that conversation, we request the following: 1) the Annual Unit Audit find one SWMU at the Rinchem Company, Inc. facility in Albuquerque, and 2) that the existing permit and application stand as they are, but the permit issued by NMED and EPA specify that all the SWMUs be changed to one which incorporates all hazardous waste handling areas outlined in the current permit application. Also Be aware that, based on the multiple and considerable delays in repermitting our application, we are not willing to modify the SWMU within the application and encounter additional significant repermitting delays.



WE DO IT WELL



Documentation Verification
Assessment 1995
File T7: NC2015

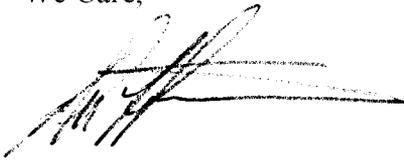
BECAUSE WE CARE

Please be advised that Rinchem's only SWMU is the operating unit. We have no units, or areas, which are undergoing closure, or post closure care. Our facility is engineered and operated to prevent contamination of the environment, and it has worked. There are no other areas of concern.

We look forward to working with NMED personnel on the Annual Unit Audit and on repermitting.

If you or others at NMED have any questions on these issues, please call me.

We Care,

A handwritten signature in black ink, appearing to read 'John Fitzsimons', with a long horizontal flourish extending to the right.

John Fitzsimons, Manager
Field Services

c Robert Edgar, Manager, E, S&H
Jeff Kubisak, Director of Field Operations