



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo Street
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



PETER MAGGIORE
SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 4, 1999

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
EPA ID NO. NMD002208627-2

Dear Mr. Moore:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) is in the process finalizing the Draft Permit for the Rinchem Company Inc.'s (RCI's) Container Storage Permit.

We are requesting the following information in order to be able to complete the Draft Permit to proceed to the Public Notice phase and also provide the U.S. EPA notice that the Draft Permit is available for review. EPA's interest will center mainly on the issue of imported waste to your facility since authority over import of hazardous waste from foreign countries remains with EPA. The following bullet statements cover the topics to be covered by your response.

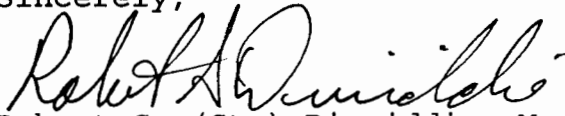
- Provide your rationale to support your Closure and Post-Closure cost estimates, also convert from 1995 dollars to in 1998 dollars;
- Provide a detailed description of the operating units, attach as built designs if available. Include the dimensions, maximum capacities for wastes for permitted(operating) units, and waste storage configurations for waste to be stored in each unit;
- Submit a proof or certification that your liability Insurance is in effect and covers or will cover the life of the permit;

Mr. Moore, Rinchem Company, Inc.
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- Provide specific and detailed information identifying Solid Waste Management Units which need to be addressed under Corrective Action (the Hazardous Solid Waste Act HSWA Amendment of 1984 to The Resource Conservation Recovery Act (RCRA) in this facility permit.
- Provide information on RCI's proposed methodology to comply with the regulations governing the acceptance of hazardous waste from a foreign source, as stipulated in 40 CFR §264.12(a)(1), 40 CFR 262.20 and 40 CFR 262.60 and other applicable regulations to import of hazardous waste from a foreign country.

If you have any questions, please contact either myself (505) 827-1561 ext.1039 , Steve Pullen (505) 827 x 1073, or Cornelius Amindyas of my staff at (505) 827-1561 ext 1030.

Sincerely,



Robert S. (Stu) Dinwiddie, Manager
RCRA Permits Management Program

cc: Benito Garcia, Chief, HRMB
David Neleigh, Chief, EPA Region 6 (6PD-N)
File: Red 99

SCHEDULE A

EPA Identification Number: NMD002208627

Name: Rinchem Company, Inc.

Address: 6133 Edith Blvd. NE
Albuquerque, NM 87107**Summary of Closure Costs**

Transport of 500 drums to TSD Facility	\$123,472
Soil gas survey	\$ 13,113
Concrete coring and sampling in corrosive room	\$ 3,442
Contingency for excavating, sampling and disposal of soil	\$ 28,815
Certification of complete closure by Professional Engineer	\$ 6,556
Closure Report to NMED	\$ 6,556
Total Estimated Closure Cost (1998 dollars)	\$181,954

ACORD CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YY)
04/29/98

PRODUCER

Poe & Brown of Arizona
4041 N. Central Avenue
Suite 1400
Phoenix AZ 85012

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY A	Commerce & Industry Ins
COMPANY B	American Intl Specialty
COMPANY C	(through AIG)
COMPANY D	

INSURED

Rinchem Company Inc
8133-39 Edith Blvd NE

Albuquerque NM 87107

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input checked="" type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR OWNERS & CONTRACTORS PROT <input checked="" type="checkbox"/> CONTRACTUAL LIAB INCL	GL4177703	04/30/98	04/30/99	GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMPROP AGG \$ 2,000,000 PERSONAL & ADV INJURY \$ 1,000,000 EACH OCCURRENCE \$ 1,000,000 FIRE DAMAGE (Any one fire) \$ 50,000 MED EXP (Any one person) \$ 5,000
A	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input checked="" type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS <input checked="" type="checkbox"/> MCS90 ENDT(INC POLLUTION)	CA5053382/5053383	04/30/98	04/30/99	COMBINED SINGLE LIMIT \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	GARAGE LIABILITY <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN AUTO ONLY: EACH ACCIDENT \$ AGGREGATE \$
A	EXCESS LIABILITY <input checked="" type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM	8199796-EXCESS OF GEN'L LIAB, AUTO LIAB, W/C-EMPL LIAB	04/30/98	04/30/99	EACH OCCURRENCE \$ 4,000,000 AGGREGATE \$ 4,000,000
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY THE PROPRIETOR/PARTNERS/EXECUTIVE OFFICERS ARE: <input type="checkbox"/> INCL <input type="checkbox"/> EXCL				WC STATUTORY LIMITS <input type="checkbox"/> OTH-ER <input type="checkbox"/> EL EACH ACCIDENT \$ EL DISEASE - POLICY LIMIT \$ EL DISEASE - EA EMPLOYEE \$
A	ENVIRONMENTAL LIABILITY: POLLUTION LEGAL LIAB	PLL2670724	04/30/98	04/30/99	LIMITS ON EACH POL: EACH LOSS 1,000,000 TOTAL ALL LOSSES/POL 2,000,000
B	CONTRACTORS POLLUTION LIA	CPL2670723	04/30/98	04/30/99	

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS
 Automobile Liability and Umbrella Excess Auto Liability coverages extend to cover "Pollution" losses from property being transported by the named insured.

CERTIFICATE HOLDER:

TO WHOM IT MAY CONCERN

CANCELLATION
 SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 45 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.
 AUTHORIZED REPRESENTATIVE
 Janette Smith, CPIW *Janette Smith*

ACTIVE PERMITTED OPERATIONAL UNIT AREAS / SOLID WASTE MANAGEMENT UNIT INFORMATION

[40 CFR 270.14 (d)]

For the purposes of this permit, we consider the facility to be separated into two areas. The active permitted operational unit areas and, the solid waste management unit area. The active permitted operational unit area includes the building containing the storage areas, the docks and the collection tank connected to the flammable storage area. The rain water impoundments and drainage areas within the fenced in boundaries are considered possible solid waste management units at closure. Figure 5 is a copy of the drawing of the facility that was submitted with Part A of the permit application. The location of the facility is designated on the topographic map required by paragraph (b) (19) of 40 CFR 270.14. The map is Figure 4. Figures 4 and 5 are to be used jointly in supplying the required information.

The facility has been in operation since January 1, 1987 and has been used as a transfer facility for wastes with the following hazardous classes: 2.1, 2.2, 2.3, 3.0, 4.1, 4.2, 4.3, 5.1, 5.2, 6.0, 6.1, 6.2, 8.0 and 9.0. Figure 5 identifies the areas in regards to the RCRA Facility Assessment as follows :

- Rooms E & F Storage Areas

These active storage units which are specifically designed to warehouse chemicals are located at the south end of the facility and are approximately 110 feet x 50 feet in size each. The approximate chemical storage capacity for each unit is 81,800 gallons. The walls of the building are four-hour fire walls. Floors in the warehouse are recessed four inches below the stem wall, expansion joints are caulked, and the floor is sealed with epoxy to prevent possible contamination of the soil should a spill occur. The floor slopes to the aisles to expose any spill quickly. This area stores prepackaged chemicals for distribution and spent wastes.

No releases to report in these areas.

Rooms A & B Controlled Temperature Storage Areas

These active storage units are specifically designed to warehouse chemicals for distribution and waste that are sensitive to temperature changes. These areas are approximately 25 feet x 50 feet each and have a four-hour fire wall on the south end and a two-hour fire wall to the west end separating them from the other storage areas. The approximate chemical storage capacity for each unit is 15,840 gallons. The floor is recessed four inches below the stemwall and slopes to a catch basin. The expansion joints in the floor are caulked and the floor is sealed with epoxy to prevent possible contamination of the soil should a spill occur. No releases to report in these areas.

Rooms C & D Storage Areas

These active storage units are designed to warehouse chemicals for distribution and wastes. Rooms C and D are approximately 100 feet x 50 feet each. The approximate chemical storage capacity for room C is 79,860 gallons and room D is 73,900 gallons. The floor in both rooms is recessed four inches from the stemwall and the joints in the floor are caulked. The floor has an epoxy seal on it to prevent contamination of the soil should a spill occur. All walls running north and south are four-hour fire walls and all east west walls are two-hour fire walls. No reportable releases to report.

- ### Truck Loading Dock

The Truck Loading Dock is located in the southeast area of the facility. The dock is constructed of concrete with a metal roof. The floor has an epoxy seal and the joints are caulked to prevent ground contamination if a spill should occur. The floor is sloped to the center to contain a spill and there is a concrete secondary containment system around the lower elevation to capture leakage involving a vehicle.

There has been no release of hazardous materials or wastes to report.

Spill Drain System

The Spill Drain System manages any spills which may occur in Rooms B and C. The system consists of concrete construction, a cast-iron grate covering, and a six-inch

cast-iron pipe that will carry any spills to the Spill Collection Tank. The Spill Drain System is active and been in operation since January 1, 1987.

Spill Collection Tank

Any spills that occur in Rooms B & D are drained to the Spill Collection Tank located below the west dock. This dock is located on the west end of room D and is approximately 30 feet X 60 feet. The inground tanks are constructed of concrete and consist of a 500 gallon tank located inside of a 3790 gallon vault. A six-inch cast-iron pipe will carry the spill to the 500 gallon tank, if the spill is greater than 500 gallons it will overflow into the 3790 gallon vault. There has been no chemical cleanup in this area to report.

If a release of hazardous waste or hazardous constituents from the active permitted operational unit areas into the environment occur, Rinchem will submit all available information pertaining to the release. Rinchem will also report any spills or contamination within the drainage areas.

The Director has not ascertained it necessary to complete a RCRA Facility Assessment of the Rinchem facility so no sampling and analysis of groundwater, landsurface, and subsurface, surface water or air has been conducted.