



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

November 18, 1999

Dr. Robert S. (Stu) Dinwiddie, Ph.D., Program Manager
RCRA Permits Management Program
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
2044 Galisteo Street
Santa Fe, NM 87505-2100

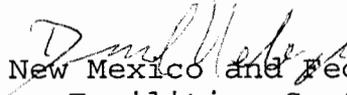
RE: Comments on Rinchem Company, Inc. Container Storage Unit,
Draft RCRA Permit, EPA ID No. NMD002208627-1

Dear Dr. Dinwiddie:

On October 19, 199 the Environmental Protection Agency (EPA) received a copy of the Draft Permit Renewal Application for Rinchem Company, Inc. Container Storage Unit, EPA ID No. NMD002208627-1. The application also included your request to review and submit comments to the Hazardous and Radioactive Materials Bureau within thirty (30) days. In addition you requested EPA submit the RCRA Subpart CC Organic Air Emissions Module for incorporation into the Permit as Module V.

EPA has reviewed the draft permit application. Our comments are enclosed for your reference. EPA has also submitted language for the RCRA Subpart CC Organic Air Emissions Module for incorporation into the Permit as Module V. If you have any questions or require additional information on EPA's review of the Draft Permit Renewal Application for the Rinchem Company, Inc. Container Storage Unit please contact me at (214) 665-6785 or James Harris of my staff at (214) 665-8302.

David Neleigh, Chief


New Mexico and Federal
Facilities Section (6PD-N)

COMMENTS ON THE
RINCHEM COMPANY OPERATIONAL PERMIT RENEWAL APPLICATION,
EPA NO. NMD002208627

Permit Attachment C, "Authorized Facility Operating Units,
Introduction":

The first paragraph on page one references Attachment L,
Corrective Action Units. This is actually in Attachment K.

Page 10, "Precautions for Prevention of Accidental Ignition
or Reaction of Ignitable, Reactive or Incompatible Wastes",
first paragraph. The Waste Analysis Plan, Attachment K.
The Waste Analysis Plan is in the Part B.