



August 12, 2011

Mr. John Kieling
Hazardous Waste Acting Bureau Chief
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303
(505) 428-2500



RE: REAPPLICATION FOR RINCHEM COMPANY, INC. RCRA PART B PERMIT - #NMD002208627-1.

Dear Mr. Kieling:

Enclosed is all the required documentation for Rinchem Company's renewal application for the Part B Permitted TSDF – EPA ID# NMD002208627. The enclosed application is in accordance with the requirement of the current Part B Permit that expires on February 12, 2012. In Module I, page 3 of 14, it states; "The Permittee may renew this permit by submitting an application for a new permit at least 180 calendar days before the expiration date of this Permit. [20.4.1.900 NMAC incorporating 40 CFR 270.10 (h) and 270.30(b)]." Rinchem is requesting NMED to review the enclosed application for completion.

It is noted in this application that due to the pending acquisition of the Rinchem Part B TSDF by Advanced Chemical Transport, there will be an address change of the existing facility from 6133 Edith Blvd. to 6137 Edith Blvd; because of the address change NMED has requested Rinchem to issue Form 8700-12 to address the address change as well as request a new EPA ID # for the new address, which has been included in this Permit Application.

Rinchem has enclosed the following for the renewal application:

- Part A (to include Form 8700-12 noted above)
- Part B
- Disclosure Forms for Rinchem Company, Inc.
- Disclosure Forms for Advanced Chemical Transport/Treatment
- Corresponding Documentation in regard to the address change of the existing TSDF.

We look forward to working with NMED to develop a permit that meets the regulatory requirement. If you have any questions, please do not hesitate to contact myself at 505-998-4131 or Polly Wagner at 505-998-4143. Thank you for your time and consideration of this matter.

Sincerely,

Lise V. Gorgone

Vice President, Director of Operations

**We do it well...
Because we care**





Enclosures

cc: C. Amindyas, NMED HWB

We do it well...
Because we care



6133 Edith Blvd. NE, Albuquerque, NM 87107 www.rinchem.com 505-345-3655 or 888-3PL-CHEM

LIBRARY COPY

**PART B TSDF RENEWAL APPLICATION
FOR RINCHEM COMPANY, INC**

Submitted to

New Mexico Environmental Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6030

Submitted by



6133 Edith Blvd. NE
Albuquerque, NM 87107
505-998-4143
Email: pwagner@rinchem.com

August 12, 2011

- **PART A**

- **PART B**

- **APPENDIX A**

- *Figure 1 – General Location Map of the Facility*
- *Figure 2 – Flood Insurance Rate Map*
- *Figure 3 – Geological Map*
- *Figure 4 – Topographic Map*
- *Figure 5 – Zoning Map*
- *Figure 6 – Facility Layout*
- *Figure 7 – Site Plan*
- *Figure 8 – Wind Rose*
- *Figure 9 – Photographs of the Facility*

RINCHEM COMPANY, INC – PART B TSD
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

APPLICATION: CONTENTS OF PART A OF PERMIT APPLICATION: [40CFR 270.13]

| | | | | | | | |
|---|--|--|---|---|---|---|---|
| <p>SEND COMPLETED FORM TO: The Appropriate State or Regional Office.</p> | <p>United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM</p> | |  | | | | |
| <p>1. Reason for Submittal</p> <p>MARK ALL BOX(ES) THAT APPLY</p> | <p>Reason for Submittal:</p> <p><input checked="" type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)</p> <p><input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)</p> <p><input checked="" type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)</p> <p><input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup <u>in one or more months</u> of the report year (or State equivalent LQG regulations)</p> | | | | | | |
| <p>2. Site EPA ID Number</p> | <p>EPA ID Number <input type="text"/> <input type="text"/></p> | | | | | | |
| <p>3. Site Name</p> | <p>Name: Rinchem Company, Inc.</p> | | | | | | |
| <p>4. Site Location Information</p> | <p>Street Address: 6137 Edith Blvd. NE</p> <p>City, Town, or Village: Albuquerque County: Bernalillo County</p> <p>State: New Mexico Country: United States Zip Code: 87107</p> | | | | | | |
| <p>5. Site Land Type</p> <p>NAICS Code(s) for the Site (at least 5-digit codes)</p> | <p><input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">A. <input type="text"/> 5 <input type="text"/> 6 <input type="text"/> 2 <input type="text"/> 2 <input type="text"/> 1 <input type="text"/> 1 <input type="text"/></td> <td style="width: 50%;">C. <input type="text"/> 5 <input type="text"/> 6 <input type="text"/> 2 <input type="text"/> 9 <input type="text"/> 9 <input type="text"/> 8 <input type="text"/></td> </tr> <tr> <td>B. <input type="text"/> 5 <input type="text"/> 6 <input type="text"/> 2 <input type="text"/> 1 <input type="text"/> 1 <input type="text"/> 2 <input type="text"/></td> <td>D. <input type="text"/> 4 <input type="text"/> 9 <input type="text"/> 3 <input type="text"/> 1 <input type="text"/> 1 <input type="text"/> 0 <input type="text"/></td> </tr> </table> | | | A. <input type="text"/> 5 <input type="text"/> 6 <input type="text"/> 2 <input type="text"/> 2 <input type="text"/> 1 <input type="text"/> 1 <input type="text"/> | C. <input type="text"/> 5 <input type="text"/> 6 <input type="text"/> 2 <input type="text"/> 9 <input type="text"/> 9 <input type="text"/> 8 <input type="text"/> | B. <input type="text"/> 5 <input type="text"/> 6 <input type="text"/> 2 <input type="text"/> 1 <input type="text"/> 1 <input type="text"/> 2 <input type="text"/> | D. <input type="text"/> 4 <input type="text"/> 9 <input type="text"/> 3 <input type="text"/> 1 <input type="text"/> 1 <input type="text"/> 0 <input type="text"/> |
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| <p>7. Site Mailing Address</p> | <p>Street or P.O. Box: 6137 Edith Blvd. NE</p> <p>City, Town, or Village: Albuquerque</p> <p>State: New Mexico Country: United States Zip Code: 87107</p> | | | | | | |
| <p>8. Site Contact Person</p> | <p>First Name: Polly MI: J Last: Wagner</p> <p>Title: Facility Manager</p> <p>Street or P.O. Box: 6137 Edith Blvd. NE</p> <p>City, Town or Village: Albuquerque</p> <p>State: New Mexico Country: United States Zip Code: 87107</p> <p>Email: pwagner@rinchem.com</p> <p>Phone: 505-998-4143 Ext.: <input type="text"/> Fax: 505-998-4343</p> | | | | | | |
| <p>9. Legal Owner and Operator of the Site</p> | <p>A. Name of Site's Legal Owner: RCI Properties-Bill Moore Date Became Owner: 1986</p> <p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> <p>Street or P.O. Box: 6133 Edith Blvd. NE</p> <p>City, Town, or Village: Albuquerque Phone: 505-345-3655</p> <p>State: New Mexico Country: United States Zip Code: 87107</p> <p>B. Name of Site's Operator: Rinchem Company, Inc. Date Became Operator: 1976</p> <p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p> | | | | | | |

10. Type of Regulated Waste Activity (at your site)
 Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.

- Y N **1. Generator of Hazardous Waste**
 If "Yes", mark only one of the following – a, b, or c.
- a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
 - b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
 - c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

- If "Yes" above, indicate other generator activities.
- Y N d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.
 - Y N e. United States Importer of Hazardous Waste
 - N f. Mixed Waste (hazardous and radioactive) Generator

- Y N **2. Transporter of Hazardous Waste**
 If "Yes", mark all that apply.
 - a. Transporter
 - b. Transfer Facility (at your site)
- Y N **3. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste permit is required for these activities.
- Y N **4. Recycler of Hazardous Waste**
- Y N **5. Exempt Boiler and/or Industrial Furnace**
 If "Yes", mark all that apply.
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, and Refining Furnace Exemption
- Y N **6. Underground Injection Control**
- Y N **7. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

- Y N **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.**
- a. Batteries
 - b. Pesticides
 - c. Mercury containing equipment
 - d. Lamps
 - e. Other (specify) _____
 - f. Other (specify) _____
 - g. Other (specify) _____

- Y N **2. Destination Facility for Universal Waste**
 Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

- Y N **1. Used Oil Transporter**
 If "Yes", mark all that apply.
 - a. Transporter
 - b. Transfer Facility (at your site)
- Y N **2. Used Oil Processor and/or Re-refiner**
 If "Yes", mark all that apply.
 - a. Processor
 - b. Re-refiner
- Y N **3. Off-Specification Used Oil Burner**
- Y N **4. Used Oil Fuel Marketer**
 If "Yes", mark all that apply.
 - a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
 - b. Marketer Who First Claims the Used Oil Meets the Specifications

10. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- a. College or University
- b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

| Please see | attached | Table 1 | | | | |
|------------|----------|---------|--|--|--|--|
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B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

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| NA | | | | | | |
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12. Notification of Hazardous Secondary Material (HSM) Activity

Y N Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

~~The Rinchem Part B Facility located at 6133 Edith Blvd. with the current EPA ID # of NMD002208627 has received authorization from Bernalillo County Zoning Department and NMED to exchange physical addresses with another Rinchem Building on the Edith Easement Road. The Part B Facility's physical address will now be 6137 Edith Blvd. NE instead of 6133 Edith Blvd. NE. Because of the new address, NMED has requested that Rinchem submit this form requesting a new EPA ID # for the changed address. The Permit renewal application will also be submitted with the new address. The new Permit, when approved, will be under the new address and new EPA ID #. It will be referenced in NMED's files and Rinchem's operating record of this change. The record will show that the two EPA ID #'s will be linked to the same Part B Facility for tracking purposes. This is all due to the pending acquisition of the Part B Facility by Advanced Chemical Transport who will be~~

~~submitting their disclosure forms with the Rinchem permit renewal to notify NMED of their intent. When the sale is final between Rinchem and Advanced Chemical Transport (ACT), ACT will submit a permit modification for the change in operator of the current permit and will also resubmit the permit application to NMED to reflect the Operator Name Change.~~

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

| Signature of legal owner, operator, or an authorized representative | Name and Official Title (type or print) | Date Signed (mm/dd/yyyy) |
|---|---|--------------------------|
| <i>Lise V. Gorgone</i> | Lise V Gorgone Vice President | 8/11/2011 |
| | | |

ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY



Before filling out this section:

- ❖ You must check with your State to determine if you are eligible to manage hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25). (See also <http://www.epa.gov/epawaste/hazard/dsw/statespf.htm>.)
- ❖ You must be managing hazardous secondary material, which is secondary material (e.g., spent material, by-product, or sludge) that when discarded, would be identified as hazardous waste under 40 CFR Part 261. Do not include any information regarding your hazardous wastes in this section.
- ❖ You must submit a completed Site Identification Form, including this Addendum, prior to operating under the exclusion(s) and by March 1 of each even-numbered year thereafter to your regulatory authority using the Site Identification Form as pursuant to 40 CFR 260.42. Persons who must satisfy this notification requirement can submit information at the same time as their Biennial Report (which is also due by March 1 of each even-numbered year).
- ❖ If you stop managing hazardous secondary material in accordance with the exclusions(s) and do not expect to manage any amount of hazardous secondary material under the exclusions(s) for at least one year, you must also submit a completed Site Identification Form, including this Addendum, within thirty (30) days pursuant to 40 CFR 260.42.

1. Indicate reason for notification. Include dates where requested.

- Notifying that the facility will begin managing hazardous secondary material as of _____ (mm/dd/yyyy).
- Re-notifying that the facility is still managing hazardous secondary material.
- Notifying that the facility has stopped managing hazardous secondary material as of _____ (mm/dd/yyyy).

2. Description of hazardous secondary material (HSM) activity. Please list the appropriate codes and quantities in **short tons** to describe your hazardous secondary material activity ONLY (do not include any information regarding your hazardous wastes in this section). Use additional pages if more space is needed.

| a. Facility code (answer using codes listed in the Code List section of the instructions) | b. Waste code(s) for hazardous secondary material (HSM) | c. Estimated short tons of HSM to be managed annually | d. Actual short tons of HSM that was managed during the most recent odd-numbered year | e. Land-based unit code (answer using codes listed in the Code List section of the instructions) |
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3. Facility has financial assurance pursuant to 40 CFR 261 Subpart H. (Financial assurance is required for reclaimers and intermediate facilities managing hazardous secondary material under 40 CFR 261.4(a)(24) and (25))

Y N Does this facility have financial assurance pursuant to 40 CFR 261 Subpart H?

United States Environmental Protection Agency
HARDOUS WASTE PERMIT INFORMATION FORM

| | | | | | | | | | | | | | |
|---|--|---------------------|----------------------------|---|---|---|---|---|---|---|-----------------------|---|---------------------------------|
| 1. Facility Permit Contact | First Name: Polly | MI: J | Last Name: Wagner | | | | | | | | | | |
| | Contact Title: Facility Manager | | | | | | | | | | | | |
| | Phone: 505-998-4143 | Ext.: | Email: pwagner@rinchem.com | | | | | | | | | | |
| 2. Facility Permit Contact Mailing Address | Street or P.O. Box: 6137 Edith Blvd. NE | | | | | | | | | | | | |
| | City, Town, or Village: Albuquerque | | | | | | | | | | | | |
| | State: New Mexico | | | | | | | | | | | | |
| | Country: United States | Zip Code: 87107 | | | | | | | | | | | |
| 3. Operator Mailing Address and Telephone Number | Street or P.O. Box: 6137 Edith Blvd. NE | | | | | | | | | | | | |
| | City, Town, or Village: Albuquerque | | | | | | | | | | | | |
| | State: New Mexico | Phone: 505-998-4143 | | | | | | | | | | | |
| | Country: United States | Zip Code: 87107 | | | | | | | | | | | |
| 4. Facility Existence Date | Facility Existence Date (mm/dd/yyyy): 1/1/1987 | | | | | | | | | | | | |
| 5. Other Environmental Permits | | | | | | | | | | | | | |
| A. Facility Type <i>(Enter code)</i> | B. Permit Number | | | | | | | | | | C. Description | | |
| R | N | M | D | 0 | 0 | 2 | 2 | 0 | 8 | 6 | 2 | 7 | HAZARDOUS WASTE FACILITY PERMIT |
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| 6. Nature of Business: | | | | | | | | | | | | | |
| PLEASE SEE ATTACHED DOCUMENT "NATURE OF BUSINESS STATEMENT" | | | | | | | | | | | | | |

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For “other” processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

B. PROCESS DESIGN CAPACITY – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
2. **UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS – Enter the total number of units for each corresponding process code.

| Process Code | Process | Appropriate Unit of Measure for Process Design Capacity | Process Code | Process | Appropriate Unit of Measure for Process Design Capacity |
|------------------|-------------------------------------|--|--|--|---|
| Disposal | | | Treatment (Continued) (for T81 – T94) | | |
| D79 | Underground Injection Well Disposal | Gallons; Liters; Gallons Per Day; or Liters Per Day | T81 | Cement Kiln | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour |
| D80 | Landfill | Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards | T82 | Lime Kiln | |
| D81 | Land Treatment | Acres or Hectares | T83 | Aggregate Kiln | |
| D82 | Ocean Disposal | Gallons Per Day or Liters Per Day | T84 | Phosphate Kiln | |
| D83 | Surface Impoundment Disposal | Gallons; Liters; Cubic Meters; or Cubic Yards | T85 | Coke Oven | |
| D99 | Other Disposal | Any Unit of Measure Listed Below | T86 | Blast Furnace | |
| Storage | | | T87 | Smelting, Melting, or Refining Furnace | |
| S01 | Container | Gallons; Liters; Cubic Meters; or Cubic Yards | T88 | Titanium Dioxide Chloride Oxidation Reactor | |
| S02 | Tank Storage | Gallons; Liters; Cubic Meters; or Cubic Yards | T89 | Methane Reforming Furnace | |
| S03 | Waste Pile | Cubic Yards or Cubic Meters | T90 | Pulping Liquor Recovery Furnace | |
| S04 | Surface Impoundment | Gallons; Liters; Cubic Meters; or Cubic Yards | T91 | Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid | |
| S05 | Drip Pad | Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards | T92 | Halogen Acid Furnaces | |
| S06 | Containment Building Storage | Cubic Yards or Cubic Meters | T93 | Other Industrial Furnaces Listed in 40 CFR 260.10 | |
| S99 | Other Storage | Any Unit of Measure Listed Below | T94 | Containment Building Treatment | Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour |
| Treatment | | | Miscellaneous (Subpart X) | | |
| T01 | Tank Treatment | Gallons Per Day; Liters Per Day | X01 | Open Burning/Open Detonation | Any Unit of Measure Listed Below |
| T02 | Surface Impoundment | Gallons Per Day; Liters Per Day | X02 | Mechanical Processing | Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day |
| T03 | Incinerator | Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour | X03 | Thermal Unit | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; or Million BTU Per Hour |
| T04 | Other Treatment | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour | X04 | Geologic Repository | Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters |
| T80 | Boiler | Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour | X99 | Other Subpart X | Any Unit of Measure Listed Below |

| Unit of Measure | Unit of Measure Code | Unit of Measure | Unit of Measure Code |
|------------------|----------------------|----------------------|----------------------|
| Gallons |G | Short Tons Per Hour |D |
| Gallons Per Hour |E | Short Tons Per Day |N |
| Gallons Per Day |U | Metric Tons Per Hour |W |
| Liters |L | Metric Tons Per Day |S |
| Liters Per Hour |H | Pounds Per Hour |J |
| Liters Per Day |V | Kilograms Per Hour |X |
| | | Million BTU Per Hour |X |

| Unit of Measure | Unit of Measure Code |
|-----------------|----------------------|
| Cubic Yards |Y |
| Cubic Meters |C |
| Acres |B |
| Acre-feet |A |
| Hectares |Q |
| Hectare-meter |F |
| BTU Per Hour |I |

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

- A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. **ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. **UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | CODE | METRIC UNIT OF MEASURE | CODE |
|-------------------------|------|------------------------|------|
| POUNDS | P | KILOGRAMS | K |
| TONS | T | METRIC TONS | M |

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 9.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| Line Number | A. EPA Hazardous Waste No. (Enter code) | | | | | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | D. PROCESSES | | | | | | | | | | | | | | | |
|-------------|---|---|---|---|---|----------------------------------|---------------------------------|--------------|---|---|--|---|---|--|--|--|--|--|--|--|--|--|---------------------|
| | (1) PROCESS CODES (Enter Code) | | | | | | | | | | (2) PROCESS DESCRIPTION (If code is not entered in 9.D(1)) | | | | | | | | | | | | |
| X | 1 | K | 0 | 5 | 4 | 900 | P | T | 0 | 3 | D | 8 | 0 | | | | | | | | | | |
| X | 2 | D | 0 | 0 | 2 | 400 | P | T | 0 | 3 | D | 8 | 0 | | | | | | | | | | |
| X | 3 | D | 0 | 0 | 1 | 100 | P | T | 0 | 3 | D | 8 | 0 | | | | | | | | | | |
| X | 4 | D | 0 | 0 | 2 | | | | | | | | | | | | | | | | | | Included With Above |

| Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.) | | | | | | | | | | | | |
|---|---|----------------------------------|---------------------------------|--------------------------------|--|--|--|--|--|--|--|--|
| Line Number | A. EPA Hazardous Waste No. (Enter code) | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | D. PROCESSES | | | | | | | | |
| | | | | (1) PROCESS CODES (Enter Code) | | | | | (2) PROCESS DESCRIPTION (If code is not entered in 9.D(1)) | | | |
| 1 | | Please see | attached | | | | | | | | | |
| 2 | | List: | Table 1 | | | | | | | | | |
| 3 | | | | | | | | | | | | |
| 4 | | | | | | | | | | | | |
| 5 | | | | | | | | | | | | |
| 6 | | | | | | | | | | | | |
| 7 | | | | | | | | | | | | |
| 8 | | | | | | | | | | | | |
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| 14 | | | | | | | | | | | | |
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| 16 | | | | | | | | | | | | |
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| 28 | | | | | | | | | | | | |
| 29 | | | | | | | | | | | | |
| 30 | | | | | | | | | | | | |
| 31 | | | | | | | | | | | | |
| 32 | | | | | | | | | | | | |
| 33 | | | | | | | | | | | | |
| 34 | | | | | | | | | | | | |
| 35 | | | | | | | | | | | | |
| 36 | | | | | | | | | | | | |

10. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

11. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

12. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

13. Comments

The Rinchem Part B Facility located at 6133 Edith Blvd. with the current EPA ID # of NMD002208627 has received authorization from Bernalillo County Zoning Department and NMED to exchange physical addresses with another Rinchem Building on the Edith Easement Road. The Part B Facility's physical address will now be 6137 Edith Blvd. NE instead of 6133 Edith Blvd. NE. Because of the new address, NMED has requested that Rinchem submit this form requesting a new EPA ID # for the changed address. The Permit renewal application will also be submitted with the new address. The new Permit, when approved, will be under the new address and new EPA ID #. It will be referenced in NMED's files and Rinchem's operating record of this change. The record will show that the two EPA ID #'s will be linked to the same Part B Facility for tracking purposes. This is all due to the pending acquisition of the Part B Facility by Advanced Chemical Transport who will be submitting their disclosure forms with the Rinchem permit renewal to notify NMED of their intent. When the sale is final between Rinchem and Advanced Chemical Transport (ACT), ACT will submit a permit modification for the change in operator of the current permit and will also resubmit the permit application to NMED to reflect the Operator Name Change.

Please see attached correspondence between NMED and Rinchem regarding these changes in operator and address to the TSDF.

NATURE OF BUSINESS STATEMENT

Rinchem Company, Inc has many customers for which it performs ongoing hazardous chemical recycling and waste disposal services. Rinchem, can provide our clients with complete on-site services for the sampling, packaging, labeling, manifesting, and transportation of various hazardous and non-regulated waste. All services rendered by Rinchem are in compliance with the applicable federal, state, and local regulations, and all Rinchem technicians are trained in accordance with OSHA requirements (29 CFR 1910.120.)

Rinchem will use the Part B Treatment, Storage And Disposal Facility (TSDF) to accept, manage, store and consolidate (repack) hazardous wastes under RCRA's regulations. We will also transport waste from generator's sites to disposal facilities under RCRA and other regulations using the facility as a transfer station. Rinchem plans to store, consolidate and transport waste from foreign and domestic generators. Rinchem will also be managing the storage of various consumer product chemicals for its third party logistics warehousing operations.

The wastes manifested to Rinchem Company, Inc. may be stored at the facility until economic quantity loads can be transported to disposal facilities. Some wastes will be bulked for transportation in tankers or other bulk containers such as roll-offs. Other compatible wastes may be consolidated and repacked to receive the best value for disposal.

The process for ongoing chemical waste management, as well as some features and benefits, are listed below:

Waste Collection

Waste chemicals are collected from all listed facilities. Rinchem and a facility representative mutually agree on scheduled collection times, disposal or recycling methods, emergency procedures, site access, and other conditions that may be pertinent. All waste chemicals are classified for shipment by trained field chemists.

Waste Profiling

All EPA approved disposal facilities require submission of a waste profile sheet, which characterizes a waste stream. The profile sheet is based on Knowledge of Process information and/or analysis, and may require an accompanying sample of material. Rinchem completes the Waste Profile Sheet, presents it to a representative of your company for signature, and will approve for acceptance at the Rinchem Part B facility.

Manifesting

Our service to hazardous waste generators includes the preparation of the appropriate state hazardous waste manifests. Utilizing Rinchem's customized database enables us to prepare waste profiles, manifests and land disposal restriction forms for our client's review and signature.

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Disposal

Any waste received at the Rinchem Part B TSDF from waste generators is recycled, treated, or disposed of by approved EPA methods, and is handled in compliance with the existing operational permits and restrictions governing each Treatment, Storage And Disposal Facility (TSDF) Selection.

Liability Protection

Warranties, indemnification, and insurance coverage for our clients' protection are provided (starting when our field technicians arrive on site) during the loading, transportation, treatment, and disposal tasks. Waste is transported directly to the Rinchem Part B permitted TSDF and then to the final disposal destination to ensure minimal potential for liability.

Quality Assurance

Final approval for acceptance of generator waste is the responsibility of the waste disposal facility; however, packaged waste is not removed from any generator facility until final approval has been granted by the Rinchem Part B permitted TSDF or to the selected disposal facility. This process assures efficient removal and disposal of waste streams.

Depending upon available resources, Rinchem can mobilize trained and experienced hazardous materials personnel, equipment, and tools for remediation and emergency chemical spill response projects. Our expertise and knowledge of managing and performing work under a wide variety of conditions has assisted numerous customers in decontamination tasks, remediation projects, and site clean-ups.

Health and Safety Plan

Rinchem's technicians will generate a site specific Health and Safety Plan for each project, brief all project participants on safety procedures, and secure the area in accordance with OSHA regulations (29 CFR 1920.120).

Sampling

Rinchem's field technicians are trained and experienced in collecting samples from the environment as well as from generated hazardous waste from containers, tanks, waste piles, ponds, and lagoons. They are experienced in representative, composite, worst-case, and swipe sampling in compliance with EPA regulations. The sample preparation, collection, and preservation are performed in compliance with applicable laws and regulations including "EPA's SW-846," "A Compendium of Superfund Field Operation Methods," and sections of EPA 40 CFR.

Chemical Lab Packing

In order to avoid unnecessary economic and environmental liability, spilled chemicals and outdated or expired chemicals must be handled and packed in both a safe and legal manner. Rinchem's lab packing service satisfies all regulations stipulated in 49 CFR 173.12, and is an efficient method of segregating

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chemicals and bulking hazardous waste streams for transportation. We specifically designed this service to provide the maximum value to our customers while maintaining the lowest total cost for analysis and disposal of multiple hazard classes.

Lab packing services include:

- The identification and inventory of chemicals by hazard, quantity and container type
- Safely segregating and bulking chemicals by hazard class
- Packaging chemicals in the proper UN approved containers
- Labeling containers as required by regulations
- Preparing all manifests and accompanying documentation
- Providing transportation to an EPA approved disposal facility
- Delivering the certificate of disposal for “cradle-to-grave” tracking

Household Hazardous Waste Management

In conjunction with city or county agencies, Rinchem establishes drop-off locations on specified dates and collects residential household hazardous wastes such as paints, pesticides, cleaners, used oil, gasoline, batteries and fluorescent light bulbs. Rinchem then ensures that such material is disposed of or recycled in an environmentally friendly and safe manner.

TABLE 1: HAZARDOUS WASTE CODES ACCEPTED AT RINCHEM

| EPA Hazardous Number | Estimated Annual Quantity Of Waste | Unit of Measure | Process Waste Codes |
|----------------------|------------------------------------|-----------------|---------------------|
| D001 | 2200 | T | S01 |
| D002 | 500 | T | S01 |
| D003 | 500 | T | S01 |
| D004 | 25 | T | S01 |
| D005 | 25 | T | S01 |
| D006 | 25 | T | S01 |
| D007 | 25 | T | S01 |
| D008 | 25 | T | S01 |
| D009 | 25 | T | S01 |
| D010 | 25 | T | S01 |
| D011 | 25 | T | S01 |
| D012 | 25 | T | S01 |
| D013 | 25 | T | S01 |
| D014 | 25 | T | S01 |
| D015 | 25 | T | S01 |
| D016 | 25 | T | S01 |
| D017 | 25 | T | S01 |
| D018 | 25 | T | S01 |
| D019 | 25 | T | S01 |
| D020 | 25 | T | S01 |
| D021 | 25 | T | S01 |
| D022 | 25 | T | S01 |
| D023 | 25 | T | S01 |
| D024 | 25 | T | S01 |
| D025 | 25 | T | S01 |
| D026 | 25 | T | S01 |
| D027 | 25 | T | S01 |
| D028 | 25 | T | S01 |
| D029 | 25 | T | S01 |
| D030 | 25 | T | S01 |
| D031 | 25 | T | S01 |
| D032 | 25 | T | S01 |
| D033 | 25 | T | S01 |
| D034 | 25 | T | S01 |
| D035 | 25 | T | S01 |
| D036 | 25 | T | S01 |

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| | | | |
|------|------|---|-----|
| D037 | 25 | T | S01 |
| D038 | 25 | T | S01 |
| D039 | 25 | T | S01 |
| D040 | 25 | T | S01 |
| D041 | 25 | T | S01 |
| D042 | 25 | T | S01 |
| D043 | 25 | T | S01 |
| F001 | 1100 | T | S01 |
| F002 | 1100 | T | S01 |
| F003 | 1100 | T | S01 |
| F004 | 500 | T | S01 |
| F005 | 500 | T | S01 |
| F006 | 25 | T | S01 |
| F007 | 25 | T | S01 |
| F008 | 25 | T | S01 |
| F009 | 25 | T | S01 |
| F010 | 25 | T | S01 |
| F011 | 25 | T | S01 |
| F012 | 25 | T | S01 |
| F013 | 25 | T | S01 |
| F014 | 25 | T | S01 |
| F015 | 25 | T | S01 |
| F016 | 25 | T | S01 |
| F017 | 25 | T | S01 |
| F018 | 25 | T | S01 |
| F019 | 25 | T | S01 |
| F020 | 25 | T | S01 |
| F021 | 25 | T | S01 |
| F022 | 25 | T | S01 |
| F023 | 25 | T | S01 |
| F024 | 25 | T | S01 |
| F025 | 25 | T | S01 |
| F026 | 25 | T | S01 |
| F027 | 25 | T | S01 |
| F028 | 25 | T | S01 |
| F029 | 25 | T | S01 |
| F030 | 25 | T | S01 |
| F031 | 25 | T | S01 |
| F032 | 25 | T | S01 |
| F033 | 25 | T | S01 |
| F034 | 25 | T | S01 |
| F035 | 25 | T | S01 |

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| | | | |
|------|----|---|-----|
| F036 | 25 | T | S01 |
| F037 | 25 | T | S01 |
| F038 | 25 | T | S01 |
| F039 | 25 | T | S01 |
| K001 | 25 | T | S01 |
| K002 | 25 | T | S01 |
| K003 | 25 | T | S01 |
| K004 | 25 | T | S01 |
| K005 | 25 | T | S01 |
| K006 | 25 | T | S01 |
| K007 | 25 | T | S01 |
| K008 | 25 | T | S01 |
| K009 | 25 | T | S01 |
| K010 | 25 | T | S01 |
| K011 | 25 | T | S01 |
| K012 | 25 | T | S01 |
| K013 | 25 | T | S01 |
| K014 | 25 | T | S01 |
| K015 | 25 | T | S01 |
| K016 | 25 | T | S01 |
| K017 | 25 | T | S01 |
| K018 | 25 | T | S01 |
| K019 | 25 | T | S01 |
| K020 | 25 | T | S01 |
| K021 | 25 | T | S01 |
| K022 | 25 | T | S01 |
| K023 | 25 | T | S01 |
| K024 | 25 | T | S01 |
| K025 | 25 | T | S01 |
| K026 | 25 | T | S01 |
| K027 | 25 | T | S01 |
| K028 | 25 | T | S01 |
| K029 | 25 | T | S01 |
| K030 | 25 | T | S01 |
| K031 | 25 | T | S01 |
| K032 | 25 | T | S01 |
| K033 | 25 | T | S01 |
| K034 | 25 | T | S01 |

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| | | | |
|------|----|---|-----|
| K035 | 25 | T | S01 |
| K036 | 25 | T | S01 |
| K037 | 25 | T | S01 |
| K038 | 25 | T | S01 |
| K039 | 25 | T | S01 |
| K040 | 25 | T | S01 |
| K041 | 25 | T | S01 |
| K042 | 25 | T | S01 |
| K043 | 25 | T | S01 |
| K044 | 25 | T | S01 |
| K045 | 25 | T | S01 |
| K046 | 25 | T | S01 |
| K047 | 25 | T | S01 |
| K048 | 25 | T | S01 |
| K049 | 25 | T | S01 |
| K050 | 25 | T | S01 |
| K051 | 25 | T | S01 |
| K052 | 25 | T | S01 |
| K053 | 25 | T | S01 |
| K054 | 25 | T | S01 |
| K055 | 25 | T | S01 |
| K056 | 25 | T | S01 |
| K057 | 25 | T | S01 |
| K058 | 25 | T | S01 |
| K059 | 25 | T | S01 |
| K060 | 25 | T | S01 |
| K061 | 25 | T | S01 |
| K062 | 25 | T | S01 |
| K063 | 25 | T | S01 |
| K064 | 25 | T | S01 |
| K065 | 25 | T | S01 |
| K066 | 25 | T | S01 |
| K067 | 25 | T | S01 |
| K068 | 25 | T | S01 |
| K069 | 25 | T | S01 |
| K070 | 25 | T | S01 |
| K071 | 25 | T | S01 |
| K072 | 25 | T | S01 |
| K073 | 25 | T | S01 |
| K074 | 25 | T | S01 |
| K075 | 25 | T | S01 |
| K076 | 25 | T | S01 |

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| | | | |
|------|----|---|-----|
| K077 | 25 | T | S01 |
| K078 | 25 | T | S01 |
| K079 | 25 | T | S01 |
| K080 | 25 | T | S01 |
| K081 | 25 | T | S01 |
| K082 | 25 | T | S01 |
| K083 | 25 | T | S01 |
| K084 | 25 | T | S01 |
| K085 | 25 | T | S01 |
| K086 | 25 | T | S01 |
| K087 | 25 | T | S01 |
| K088 | 25 | T | S01 |
| K089 | 25 | T | S01 |
| K090 | 25 | T | S01 |
| K091 | 25 | T | S01 |
| K092 | 25 | T | S01 |
| K093 | 25 | T | S01 |
| K094 | 25 | T | S01 |
| K095 | 25 | T | S01 |
| K096 | 25 | T | S01 |
| K097 | 25 | T | S01 |
| K098 | 25 | T | S01 |
| K099 | 25 | T | S01 |
| K100 | 25 | T | S01 |
| K101 | 25 | T | S01 |
| K102 | 25 | T | S01 |
| K103 | 25 | T | S01 |
| K104 | 25 | T | S01 |
| K105 | 25 | T | S01 |
| K106 | 25 | T | S01 |
| K107 | 25 | T | S01 |
| K108 | 25 | T | S01 |
| K109 | 25 | T | S01 |
| K110 | 25 | T | S01 |
| K111 | 25 | T | S01 |
| K112 | 25 | T | S01 |
| K113 | 25 | T | S01 |
| K114 | 25 | T | S01 |
| K115 | 25 | T | S01 |
| K116 | 25 | T | S01 |
| K117 | 25 | T | S01 |
| K118 | 25 | T | S01 |

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| | | | |
|------|----|---|-----|
| K119 | 25 | T | S01 |
| K120 | 25 | T | S01 |
| K121 | 25 | T | S01 |
| K122 | 25 | T | S01 |
| K123 | 25 | T | S01 |
| K124 | 25 | T | S01 |
| K125 | 25 | T | S01 |
| K126 | 25 | T | S01 |
| K127 | 25 | T | S01 |
| K128 | 25 | T | S01 |
| K129 | 25 | T | S01 |
| K130 | 25 | T | S01 |
| K131 | 25 | T | S01 |
| K132 | 25 | T | S01 |
| K133 | 25 | T | S01 |
| K134 | 25 | T | S01 |
| K135 | 25 | T | S01 |
| K136 | 25 | T | S01 |
| | | | |
| P001 | 2 | T | S01 |
| P002 | 2 | T | S01 |
| P003 | 2 | T | S01 |
| P004 | 2 | T | S01 |
| P005 | 2 | T | S01 |
| P006 | 2 | T | S01 |
| P007 | 2 | T | S01 |
| P008 | 2 | T | S01 |
| P009 | 2 | T | S01 |
| P010 | 2 | T | S01 |
| P011 | 2 | T | S01 |
| P012 | 2 | T | S01 |
| P013 | 2 | T | S01 |
| P014 | 2 | T | S01 |
| P015 | 2 | T | S01 |
| P016 | 2 | T | S01 |
| P017 | 2 | T | S01 |
| P018 | 2 | T | S01 |
| P019 | 2 | T | S01 |
| P020 | 2 | T | S01 |
| P021 | 2 | T | S01 |
| P022 | 2 | T | S01 |
| P023 | 2 | T | S01 |

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| | | | |
|------|---|---|-----|
| P024 | 2 | T | S01 |
| P025 | 2 | T | S01 |
| P026 | 2 | T | S01 |
| P027 | 2 | T | S01 |
| P028 | 2 | T | S01 |
| P029 | 2 | T | S01 |
| P030 | 2 | T | S01 |
| P031 | 2 | T | S01 |
| P032 | 2 | T | S01 |
| P033 | 2 | T | S01 |
| P034 | 2 | T | S01 |
| P035 | 2 | T | S01 |
| P036 | 2 | T | S01 |
| P037 | 2 | T | S01 |
| P038 | 2 | T | S01 |
| P039 | 2 | T | S01 |
| P040 | 2 | T | S01 |
| P041 | 2 | T | S01 |
| P042 | 2 | T | S01 |
| P043 | 2 | T | S01 |
| P044 | 2 | T | S01 |
| P045 | 2 | T | S01 |
| P046 | 2 | T | S01 |
| P047 | 2 | T | S01 |
| P048 | 2 | T | S01 |
| P049 | 2 | T | S01 |
| P050 | 2 | T | S01 |
| P051 | 2 | T | S01 |
| P052 | 2 | T | S01 |
| P053 | 2 | T | S01 |
| P054 | 2 | T | S01 |
| P055 | 2 | T | S01 |
| P056 | 2 | T | S01 |
| P057 | 2 | T | S01 |
| P058 | 2 | T | S01 |
| P059 | 2 | T | S01 |
| P060 | 2 | T | S01 |
| P061 | 2 | T | S01 |
| P062 | 2 | T | S01 |
| P063 | 2 | T | S01 |
| P064 | 2 | T | S01 |
| P065 | 2 | T | S01 |

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| | | | |
|------|---|---|-----|
| P066 | 2 | T | S01 |
| P067 | 2 | T | S01 |
| P068 | 2 | T | S01 |
| P069 | 2 | T | S01 |
| P070 | 2 | T | S01 |
| P071 | 2 | T | S01 |
| P072 | 2 | T | S01 |
| P073 | 2 | T | S01 |
| P074 | 2 | T | S01 |
| P075 | 2 | T | S01 |
| P076 | 2 | T | S01 |
| P077 | 2 | T | S01 |
| P078 | 2 | T | S01 |
| P079 | 2 | T | S01 |
| P080 | 2 | T | S01 |
| P081 | 2 | T | S01 |
| P082 | 2 | T | S01 |
| P083 | 2 | T | S01 |
| P084 | 2 | T | S01 |
| P085 | 2 | T | S01 |
| P086 | 2 | T | S01 |
| P087 | 2 | T | S01 |
| P088 | 2 | T | S01 |
| P089 | 2 | T | S01 |
| P090 | 2 | T | S01 |
| P091 | 2 | T | S01 |
| P092 | 2 | T | S01 |
| P093 | 2 | T | S01 |
| P094 | 2 | T | S01 |
| P095 | 2 | T | S01 |
| P096 | 2 | T | S01 |
| P097 | 2 | T | S01 |
| P098 | 2 | T | S01 |
| P099 | 2 | T | S01 |
| P100 | 2 | T | S01 |
| P101 | 2 | T | S01 |
| P102 | 2 | T | S01 |
| P103 | 2 | T | S01 |
| P104 | 2 | T | S01 |
| P105 | 2 | T | S01 |
| P106 | 2 | T | S01 |
| P107 | 2 | T | S01 |

RINCHEM COMPANY, INC – PART B TSDF

NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

| | | | |
|------|---|---|-----|
| P108 | 2 | T | S01 |
| P109 | 2 | T | S01 |
| P110 | 2 | T | S01 |
| P111 | 2 | T | S01 |
| P112 | 2 | T | S01 |
| P113 | 2 | T | S01 |
| P114 | 2 | T | S01 |
| P115 | 2 | T | S01 |
| P116 | 2 | T | S01 |
| P117 | 2 | T | S01 |
| P118 | 2 | T | S01 |
| P119 | 2 | T | S01 |
| P120 | 2 | T | S01 |
| P121 | 2 | T | S01 |
| P122 | 2 | T | S01 |
| P123 | 2 | T | S01 |
| | | | |
| U001 | 2 | T | S01 |
| U002 | 2 | T | S01 |
| U003 | 2 | T | S01 |
| U004 | 2 | T | S01 |
| U005 | 2 | T | S01 |
| U006 | 2 | T | S01 |
| U007 | 2 | T | S01 |
| U008 | 2 | T | S01 |
| U009 | 2 | T | S01 |
| U010 | 2 | T | S01 |
| U011 | 2 | T | S01 |
| U012 | 2 | T | S01 |
| U013 | 2 | T | S01 |
| U014 | 2 | T | S01 |
| U015 | 2 | T | S01 |
| U016 | 2 | T | S01 |
| U017 | 2 | T | S01 |
| U018 | 2 | T | S01 |
| U019 | 2 | T | S01 |
| U020 | 2 | T | S01 |
| U021 | 2 | T | S01 |
| U022 | 2 | T | S01 |
| U023 | 2 | T | S01 |
| U024 | 2 | T | S01 |
| U025 | 2 | T | S01 |

RINCHEM COMPANY, INC – PART B TSDF

NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

| | | | |
|------|---|---|-----|
| U026 | 2 | T | S01 |
| U027 | 2 | T | S01 |
| U028 | 2 | T | S01 |
| U029 | 2 | T | S01 |
| U030 | 2 | T | S01 |
| U031 | 2 | T | S01 |
| U032 | 2 | T | S01 |
| U033 | 2 | T | S01 |
| U034 | 2 | T | S01 |
| U035 | 2 | T | S01 |
| U036 | 2 | T | S01 |
| U037 | 2 | T | S01 |
| U038 | 2 | T | S01 |
| U039 | 2 | T | S01 |
| U040 | 2 | T | S01 |
| U041 | 2 | T | S01 |
| U042 | 2 | T | S01 |
| U043 | 2 | T | S01 |
| U044 | 2 | T | S01 |
| U045 | 2 | T | S01 |
| U046 | 2 | T | S01 |
| U047 | 2 | T | S01 |
| U048 | 2 | T | S01 |
| U049 | 2 | T | S01 |
| U050 | 2 | T | S01 |
| U051 | 2 | T | S01 |
| U052 | 2 | T | S01 |
| U053 | 2 | T | S01 |
| U054 | 2 | T | S01 |
| U055 | 2 | T | S01 |
| U056 | 2 | T | S01 |
| U057 | 2 | T | S01 |
| U058 | 2 | T | S01 |
| U059 | 2 | T | S01 |
| U060 | 2 | T | S01 |
| U061 | 2 | T | S01 |
| U062 | 2 | T | S01 |
| U063 | 2 | T | S01 |
| U064 | 2 | T | S01 |
| U065 | 2 | T | S01 |
| U066 | 2 | T | S01 |
| U067 | 2 | T | S01 |

RINCHEM COMPANY, INC – PART B TSDF

NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

| | | | |
|------|---|---|-----|
| U068 | 2 | T | S01 |
| U069 | 2 | T | S01 |
| U070 | 2 | T | S01 |
| U071 | 2 | T | S01 |
| U072 | 2 | T | S01 |
| U073 | 2 | T | S01 |
| U074 | 2 | T | S01 |
| U075 | 2 | T | S01 |
| U076 | 2 | T | S01 |
| U077 | 2 | T | S01 |
| U078 | 2 | T | S01 |
| U079 | 2 | T | S01 |
| U080 | 2 | T | S01 |
| U081 | 2 | T | S01 |
| U082 | 2 | T | S01 |
| U083 | 2 | T | S01 |
| U084 | 2 | T | S01 |
| U085 | 2 | T | S01 |
| U086 | 2 | T | S01 |
| U087 | 2 | T | S01 |
| U088 | 2 | T | S01 |
| U089 | 2 | T | S01 |
| U090 | 2 | T | S01 |
| U091 | 2 | T | S01 |
| U092 | 2 | T | S01 |
| U093 | 2 | T | S01 |
| U094 | 2 | T | S01 |
| U095 | 2 | T | S01 |
| U096 | 2 | T | S01 |
| U097 | 2 | T | S01 |
| U098 | 2 | T | S01 |
| U099 | 2 | T | S01 |
| U100 | 2 | T | S01 |
| U101 | 2 | T | S01 |
| U102 | 2 | T | S01 |
| U103 | 2 | T | S01 |
| U104 | 2 | T | S01 |
| U105 | 2 | T | S01 |
| U106 | 2 | T | S01 |
| U107 | 2 | T | S01 |
| U108 | 2 | T | S01 |
| U109 | 2 | T | S01 |

RINCHEM COMPANY, INC – PART B TSDF

NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

| | | | |
|------|---|---|-----|
| U110 | 2 | T | S01 |
| U111 | 2 | T | S01 |
| U112 | 2 | T | S01 |
| U113 | 2 | T | S01 |
| U114 | 2 | T | S01 |
| U115 | 2 | T | S01 |
| U116 | 2 | T | S01 |
| U117 | 2 | T | S01 |
| U118 | 2 | T | S01 |
| U119 | 2 | T | S01 |
| U120 | 2 | T | S01 |
| U121 | 2 | T | S01 |
| U122 | 2 | T | S01 |
| U123 | 2 | T | S01 |
| U124 | 2 | T | S01 |
| U125 | 2 | T | S01 |
| U126 | 2 | T | S01 |
| U127 | 2 | T | S01 |
| U128 | 2 | T | S01 |
| U129 | 2 | T | S01 |
| U130 | 2 | T | S01 |
| U131 | 2 | T | S01 |
| U132 | 2 | T | S01 |
| U133 | 2 | T | S01 |
| U134 | 2 | T | S01 |
| U135 | 2 | T | S01 |
| U136 | 2 | T | S01 |
| U137 | 2 | T | S01 |
| U138 | 2 | T | S01 |
| U139 | 2 | T | S01 |
| U140 | 2 | T | S01 |
| U141 | 2 | T | S01 |
| U142 | 2 | T | S01 |
| U143 | 2 | T | S01 |
| U144 | 2 | T | S01 |
| U145 | 2 | T | S01 |
| U146 | 2 | T | S01 |
| U147 | 2 | T | S01 |
| U148 | 2 | T | S01 |
| U149 | 2 | T | S01 |
| U150 | 2 | T | S01 |
| U151 | 2 | T | S01 |

RINCHEM COMPANY, INC – PART B TSDF

NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

| | | | |
|------|---|---|-----|
| U152 | 2 | T | S01 |
| U153 | 2 | T | S01 |
| U154 | 2 | T | S01 |
| U155 | 2 | T | S01 |
| U156 | 2 | T | S01 |
| U157 | 2 | T | S01 |
| U158 | 2 | T | S01 |
| U159 | 2 | T | S01 |
| U160 | 2 | T | S01 |
| U161 | 2 | T | S01 |
| U162 | 2 | T | S01 |
| U163 | 2 | T | S01 |
| U164 | 2 | T | S01 |
| U165 | 2 | T | S01 |
| U166 | 2 | T | S01 |
| U167 | 2 | T | S01 |
| U168 | 2 | T | S01 |
| U169 | 2 | T | S01 |
| U170 | 2 | T | S01 |
| U171 | 2 | T | S01 |
| U172 | 2 | T | S01 |
| U173 | 2 | T | S01 |
| U174 | 2 | T | S01 |
| U175 | 2 | T | S01 |
| U176 | 2 | T | S01 |
| U177 | 2 | T | S01 |
| U178 | 2 | T | S01 |
| U179 | 2 | T | S01 |
| U180 | 2 | T | S01 |
| U181 | 2 | T | S01 |
| U182 | 2 | T | S01 |
| U183 | 2 | T | S01 |
| U184 | 2 | T | S01 |
| U185 | 2 | T | S01 |
| U186 | 2 | T | S01 |
| U187 | 2 | T | S01 |
| U188 | 2 | T | S01 |
| U189 | 2 | T | S01 |
| U190 | 2 | T | S01 |
| U191 | 2 | T | S01 |
| U192 | 2 | T | S01 |
| U193 | 2 | T | S01 |

RINCHEM COMPANY, INC – PART B TSDF

NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

| | | | |
|------|---|---|-----|
| U194 | 2 | T | S01 |
| U195 | 2 | T | S01 |
| U196 | 2 | T | S01 |
| U197 | 2 | T | S01 |
| U198 | 2 | T | S01 |
| U199 | 2 | T | S01 |
| U200 | 2 | T | S01 |
| U201 | 2 | T | S01 |
| U202 | 2 | T | S01 |
| U203 | 2 | T | S01 |
| U204 | 2 | T | S01 |
| U205 | 2 | T | S01 |
| U206 | 2 | T | S01 |
| U207 | 2 | T | S01 |
| U208 | 2 | T | S01 |
| U209 | 2 | T | S01 |
| U210 | 2 | T | S01 |
| U211 | 2 | T | S01 |
| U212 | 2 | T | S01 |
| U213 | 2 | T | S01 |
| U214 | 2 | T | S01 |
| U215 | 2 | T | S01 |
| U216 | 2 | T | S01 |
| U217 | 2 | T | S01 |
| U218 | 2 | T | S01 |
| U219 | 2 | T | S01 |
| U220 | 2 | T | S01 |
| U221 | 2 | T | S01 |
| U222 | 2 | T | S01 |
| U223 | 2 | T | S01 |
| U224 | 2 | T | S01 |
| U225 | 2 | T | S01 |
| U226 | 2 | T | S01 |
| U227 | 2 | T | S01 |
| U228 | 2 | T | S01 |
| U229 | 2 | T | S01 |
| U230 | 2 | T | S01 |
| U231 | 2 | T | S01 |
| U232 | 2 | T | S01 |
| U233 | 2 | T | S01 |
| U234 | 2 | T | S01 |
| U235 | 2 | T | S01 |

RINCHEM COMPANY, INC – PART B TSDF

NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

| | | | |
|------|---|---|-----|
| U236 | 2 | T | S01 |
| U237 | 2 | T | S01 |
| U238 | 2 | T | S01 |
| U239 | 2 | T | S01 |
| U240 | 2 | T | S01 |
| U241 | 2 | T | S01 |
| U242 | 2 | T | S01 |
| U243 | 2 | T | S01 |
| U244 | 2 | T | S01 |
| U245 | 2 | T | S01 |
| U246 | 2 | T | S01 |
| U247 | 2 | T | S01 |
| U248 | 2 | T | S01 |
| U249 | 2 | T | S01 |

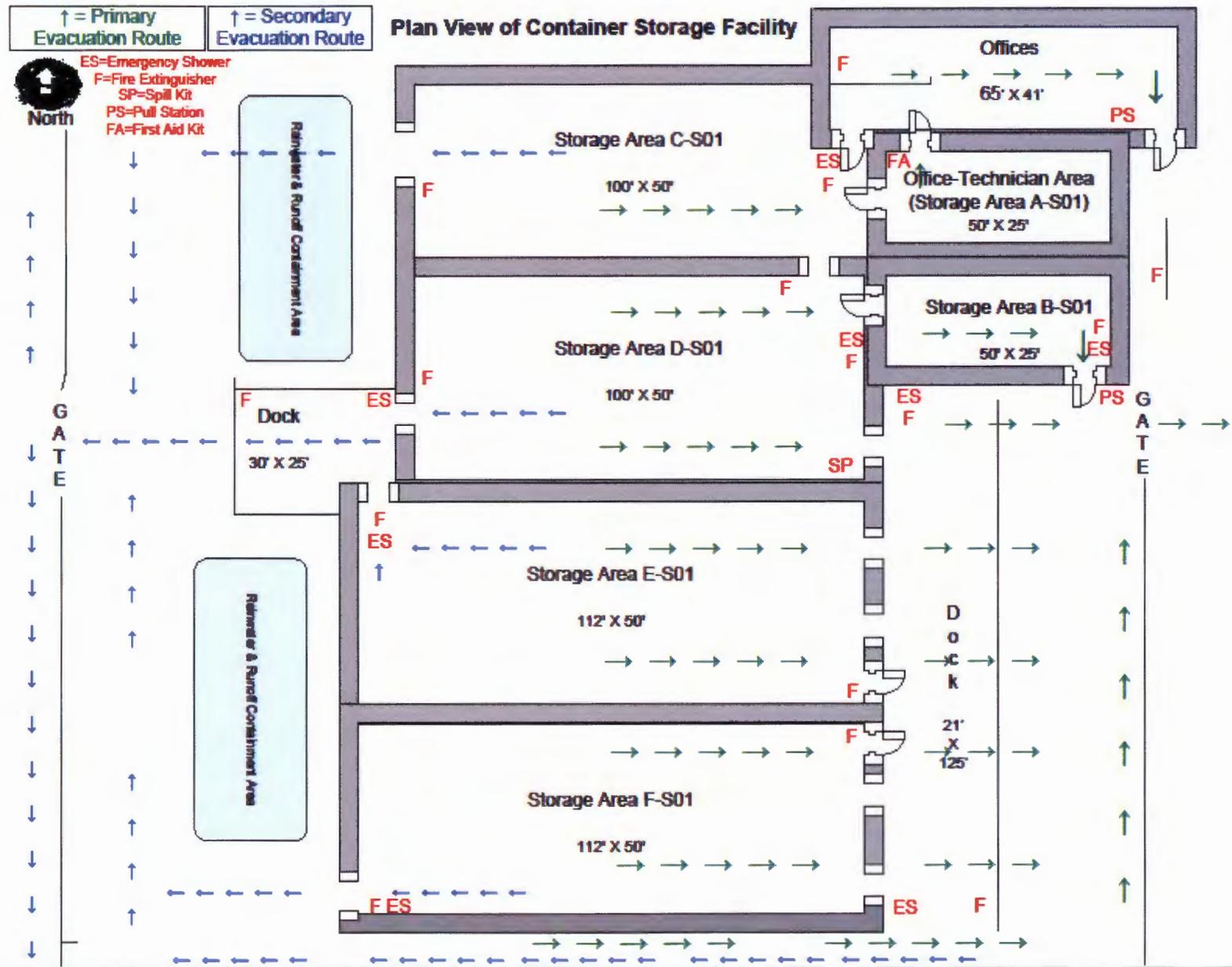
RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

**Topographic Map (#10 on Hazardous Waste Permit
Information Form)**

Please see Figure 4 in Appendix A

RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

**Facility Drawing (#11 on Hazardous Waste Permit
Information Form)**



RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

**Photographs (#12 on Hazardous Waste Permit
Information Form)**

**RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)**



Room A-S01 (currently used as office area)



Room B-S01



Room C-S01



Room D-S01

RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)



Room E-S01



Room F-S01

RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

Polly J. Wagner

From: Kielling, John, NMENV [john.kielling@state.nm.us]
Sent: Thursday, August 04, 2011 9:50 AM
To: Polly J. Wagner; Amindyas, Cornelius, NMENV
Subject: RE: Physical address for Rinchem Part B Permit

Polly,
I made a change to item 1 to make it consistent with our discussion yesterday.
If you have any questions please call me.

1. By August 12, 2011:
 - a. Rinchem is submitting the permit renewal, Parts A and B as Rinchem Company, Inc requesting a new EPA ID# on the 8700-12 Form, found at: <http://www.nmenv.state.nm.us/hwb/notifiers.html> and the new address of 6137 Edith Avenue as a "renewal".
 - b. Rinchem will also submit the disclosure statements with all of Rinchem's information.
 - c. Advanced Chemical Transport will be submitting their disclosure statements with all of ACT's (Transport) information.
2. If the permit renewal has not been approved by NMED by the time the sale is final between Rinchem and ACT, we will complete the following items to change operator ownership of the current permit, which will remain in effect unto the new permit has been approved by NMED:
 - a. We will submit a Class 1 Permit modification to NMED to change the Operator Name from Rinchem to Advanced Chemical Treatment. (new ACT corporation)
 - b. We will submit updated disclosures statements for the new corporation of Advanced Chemical Treatment to NMED.
 - c. Rinchem will notify Advanced Chemical Treatment in writing of the requirements of 20.4.900 NMAC, incorporating 40 CFR Part 270, and of the Permit as part of the requirement of our current permit in Module 1, Section I.E.3, *Transfer of Permit*.
 - d. When NMED approves Class 1 Permit Modification and all the proper notifications have been made, Advanced Chemical Treatment will be the Operator of Record of the current permit, with the current EPA ID# NMD002208627 and the current address of 6133 Edith Blvd.
3. Also, once the sale is final between Rinchem and ACT, ACT will resubmit the permit application Parts A and B as ACT with the new address of 6137 Edith Blvd and the New EPA ID#. Rinchem, NMED, and ACT will all have documentation on file stating the explanation of the address change and how the old EPA ID # NMD002208627 will link the new EPA ID # to the history of the TSDF for tracking purposes.
4. NMED will not recognize the new EPA ID # or the new address until the new permit is approved, but with all the proper notifications to NMED, NMED will recognize Advanced Chemical Transport as the Operator of the current permit when the sale is final.

John E. Kielling
Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87508-6303
john.kielling@state.nm.us

Phone: (505) 476-6035
HWB Main Phone: (505) 476-6000
Fax: (505) 476-6030

**RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)**

From: Polly J. Wagner [mailto:pwagner@Rinchem.com]
Sent: Wednesday, August 03, 2011 7:02 PM
To: Polly J. Wagner; Kleling, John, NMENV; Amindyas, Cornelius, NMENV
Subject: RE: Physical address for Rinchem Part B Permit

Hi John, I have documented a recap of our discussion this morning regarding the Part B Permit. Can you please confirm via email, so that I can share with the ACT and Rinchem Teams?

5. By August 12, 2011:
 - a. Rinchem is submitting the permit renewal, Parts A and B as Rinchem Company, Inc with the current EPA ID # of NMD002208627 and the current address of 6133 Edith Avenue as a "renewal".
 - b. At the same time Rinchem will also submit a notification form requesting a new EPA ID with the new address, adding documentation to explain the change in address and request for new EPA ID #.
 - c. Rinchem will also submit the disclosure statements with all of Rinchem's information.
 - d. Advanced Chemical **Transport** will be submitting their disclosure statements with all of ACT's (Transport) information.

6. If the permit renewal has not been approved by NMED by the time the sale is final between Rinchem and ACT, we will complete the following items to change operator ownership of the current permit, which will remain in effect until the new permit has been approved by NMED:
 - e. We will submit a Class 1 Permit modification to NMED to change the Operator Name from Rinchem to Advanced Chemical Treatment. (new ACT corporation)
 - f. We will submit updated disclosures statements for the new corporation of Advanced Chemical Treatment to NMED.
 - g. Rinchem will notify Advanced Chemical Treatment in writing of the requirements of 20.4.900 NMAC, incorporating 40 CFR Part 270, and of the Permit as part of the requirement of our current permit in Module 1, Section I.E.3, *Transfer of Permit*.
 - h. When NMED approves Class 1 Permit Modification and all the proper notifications have been made, Advanced Chemical Treatment will be the Operator of Record of the current permit, with the current EPA ID# NMD002208627 and the current address of 6133 Edith Blvd.

7. Also, once the sale is final between Rinchem and ACT, ACT will resubmit the permit application Parts A and B as ACT with the new address of 6137 Edith Blvd and the New EPA ID#. Rinchem, NMED, and ACT will all have documentation on file stating the explanation of the address change and how the old EPA ID # NMD002208627 will link the new EPA ID # to the history of the TSDF for tracking purposes.

8. NMED will not recognize the new EPA ID # or the new address until the new permit is approved, but with all the proper notifications to NMED, NMED will recognize Advanced Chemical Transport as the Operator of the current permit when the sale is final.

Again, John, thank you for all of your help and understanding with our very confusing situation. As I said before, if I have anything wrong, please let me know.

Polly Wagner, CHMM
Facility Manager - ABQ West Warehouse
Phone: 505-998-4143
Cell: 505-681-4921
Fax: 505-998-4343
Email: pwagner@rinchem.com



RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)



County of Bernalillo
Zoning, Building & Planning Department
111 Union Square St SE Ste 100
Albuquerque, NM 87102
Office (505)314-0350 Fax (505)314-0480

July 15, 2011

Rinchem
Attn: Lisa Gorgone
6133 Edith Blvd Ne
Albuquerque, NM 87107

Re: **CHANGE OF ADDRESS**

This letter is to serve notice of an address correction for: **Lot 4A-1 of Subdivision of Lot 4A Edith Land Company Cont 1.960 Ac**
Uniform Property Code: **101506131049110643**

FROM:

6133 Edith Blvd NE
Albuquerque NM 87107

TO:

6137 Edith Blvd NE
Albuquerque NM 87107

Address changes occur for the Safety, Health and Welfare of the residents of Bernalillo County. Please update your records to show this change.

If you have any questions, please contact our Permit Specialist, Wendy Barker directly at (505) 314-0362 or wbarker@bernco.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Beaman", is written over a circular stamp. The signature is fluid and cursive.

Daniel J. Beaman
Permit & Application Processing Manager

RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)



County of Bernalillo
Zoning, Building & Planning Department
111 Union Square St SE Ste 100
Albuquerque, NM 87102
Office (505)314-0350 Fax (505)314-0480

July 15, 2011

Rinchem
Attn: Lisa Gorgone
6133 Edith Blvd Ne
Albuquerque, NM 87107

Re: CHANGE OF ADDRESS

This letter is to serve notice of an address correction for: **Lot 3 Land Of Edith Land Co
The Major Portion Of Tract 2 MRGCD Map 32**
Uniform Property Code: **101506132848110644**

FROM:

**6137 Edith Blvd NE
Albuquerque NM 87107**

TO:

**6133 Edith Blvd NE
Albuquerque NM 87107**

Address changes occur for the Safety, Health and Welfare of the residents of Bernalillo County. Please update your records to show this change.

If you have any questions, please contact our Permit Specialist, Wendy Barker directly at (505) 314-0362 or wbarker@bernco.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Beaman", is written over a horizontal line.

Daniel J. Beaman
Permit & Application Processing Manager

APPLICATION: CONTENTS OF PART B: GENERAL REQUIREMENTS [40CFR 270.14]

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Table of Acronyms

| | |
|----------|---|
| CFR | Code of Federal Regulations |
| COLIWASA | Containerized Liquid Waste Sampler |
| DOT | Department of Transportation |
| DOE | Department of Energy |
| EPA | Environmental Protection Administration |
| HRMB | Hazardous and Radioactive Materials Bureau |
| KOP | Knowledge of Process |
| LDR | Land Disposal Restriction |
| MSDS | Material Safety Data Sheet |
| NMED | New Mexico Environmental Department |
| NM | New Mexico |
| OSHA | Occupational Safety and Health Administration |
| PCB | Polychlorinated Biphenyls |
| PCE | Perchloroethylene |
| PID | Photoionization Detector |
| PPE | Personal Protection Equipment |
| PAIS | Pre Acceptance Inspection Sheet |
| QA/QC | Quality Assurance/ Quality Control |
| RCRA | Resource Conservation Recovery Act |
| RCI | Rinchem Company Inc. |
| SOP | Standard Operating Procedure |
| SCBA | Self Contained Breathing Apparatus |
| TCLP | Total Concentration Leaching Procedure |
| TSCA | Toxic Substance Control Act |
| TSDF | Treatment Storage Disposal Facility |
| UN | United Nations |
| WAP | Waste Analysis Plan |

GENERAL FACILITY DESCRIPTION [40CFR 270.14(b)(1)]

INTRODUCTION

The Rinchem Company, Inc. (**Rinchem**) hazardous waste Container Storage Facility is located at 6137 Edith boulevard N.E., in the City of Albuquerque, Bernalillo County, New Mexico. The two-acre site is zoned M-1. The facility is 600 feet west of Edith Boulevard and just east of the Santa Fe Railroad mainline.

The facility known as the West Warehouse was originally constructed in 1983. In 1992, the southern half of the warehouse was built as an addition along with the canopy on the west side of the building. The warehouse building is constructed of concrete block and metal with concrete floors, steel I-beam frame and skylights. The southern portion of the warehouse has a covered loading dock with levelers and four (4), 10' x 10' overhead doors. Wall heights of the warehouse range from 11.5 to 16 feet.

The facility consists of an approximately 25,000 square foot warehouse and office, loading/unloading dock, a back dock and two rainwater containment areas. There are six chemical storage areas with one area, Room A, which is currently being used as an office area. If there is a need to use Room A has a storage area, the engineering is in place for the room to be compliant with the requirements of this permit.

Please see Appendix A for the following:

- **Figure 1** – General Location Map of the Facility
- **Figure 2** – Flood Insurance Rate Map
- **Figure 3** – Geological Map
- **Figure 4** – Topographic Map
- **Figure 5** – Zoning Map
- **Figure 6** – Facility Layout
- **Figure 7** – Site Plan
- **Figure 8** – Wind Rose
- **Figure 9** – Photographs of the Facility

CHEMICAL AND PHYSICAL ANALYSIS [40 CFR 270.14(b)(2)]

Before accepting a generator's waste at the facility, Rinchem requires the generator to provide generator process knowledge or data defining the chemical and physical characteristics of the waste stream. Profiles of each waste accepted at the facility are maintained in office files at the facility. Profiling and waste analysis procedures used at the Rinchem facility are given in the Waste Analysis Plan.

Rinchem will accept wastes for storage and/or consolidation under this permit that have any of the listed EPA Waste Codes (F001-F039, K001-K136, P001-P123 and U001-U249) and wastes that exhibit any of the characteristics of ignitability, corrosivity, toxicity and/or reactivity waste codes (D001-D043). Rinchem will also accept combinations of listed wastes and/or characteristic wastes. Please see attached list of waste codes (Table 1) Rinchem will accept and manage at facility.

TABLE 1: HAZARDOUS WASTE CODES ACCEPTED AT RINCHEM

| EPA Hazardous Number | Estimated Annual Quantity Of Waste | Unit of Measure | Process Waste Codes |
|---------------------------------|---|--------------------------------|--------------------------------|
| D001 | 2200 | T | S01 |
| D002 | 500 | T | S01 |
| D003 | 500 | T | S01 |
| D004 | 25 | T | S01 |
| D005 | 25 | T | S01 |
| D006 | 25 | T | S01 |
| D007 | 25 | T | S01 |
| D008 | 25 | T | S01 |
| D009 | 25 | T | S01 |
| D010 | 25 | T | S01 |
| D011 | 25 | T | S01 |
| D012 | 25 | T | S01 |
| D013 | 25 | T | S01 |
| D014 | 25 | T | S01 |
| D015 | 25 | T | S01 |
| D016 | 25 | T | S01 |
| D017 | 25 | T | S01 |
| D018 | 25 | T | S01 |
| D019 | 25 | T | S01 |
| D020 | 25 | T | S01 |
| D021 | 25 | T | S01 |
| D022 | 25 | T | S01 |
| D023 | 25 | T | S01 |
| D024 | 25 | T | S01 |
| D025 | 25 | T | S01 |
| D026 | 25 | T | S01 |
| D027 | 25 | T | S01 |
| D028 | 25 | T | S01 |
| D029 | 25 | T | S01 |
| D030 | 25 | T | S01 |
| D031 | 25 | T | S01 |
| D032 | 25 | T | S01 |
| D033 | 25 | T | S01 |
| D034 | 25 | T | S01 |
| D035 | 25 | T | S01 |
| D036 | 25 | T | S01 |
| D037 | 25 | T | S01 |

| | | | |
|------|------|---|-----|
| D038 | 25 | T | S01 |
| D039 | 25 | T | S01 |
| D040 | 25 | T | S01 |
| D041 | 25 | T | S01 |
| D042 | 25 | T | S01 |
| D043 | 25 | T | S01 |
| F001 | 1100 | T | S01 |
| F002 | 1100 | T | S01 |
| F003 | 1100 | T | S01 |
| F004 | 500 | T | S01 |
| F005 | 500 | T | S01 |
| F006 | 25 | T | S01 |
| F007 | 25 | T | S01 |
| F008 | 25 | T | S01 |
| F009 | 25 | T | S01 |
| F010 | 25 | T | S01 |
| F011 | 25 | T | S01 |
| F012 | 25 | T | S01 |
| F013 | 25 | T | S01 |
| F014 | 25 | T | S01 |
| F015 | 25 | T | S01 |
| F016 | 25 | T | S01 |
| F017 | 25 | T | S01 |
| F018 | 25 | T | S01 |
| F019 | 25 | T | S01 |
| F020 | 25 | T | S01 |
| F021 | 25 | T | S01 |
| F022 | 25 | T | S01 |
| F023 | 25 | T | S01 |
| F024 | 25 | T | S01 |
| F025 | 25 | T | S01 |
| F026 | 25 | T | S01 |
| F027 | 25 | T | S01 |
| F028 | 25 | T | S01 |
| F029 | 25 | T | S01 |
| F030 | 25 | T | S01 |
| F031 | 25 | T | S01 |
| F032 | 25 | T | S01 |
| F033 | 25 | T | S01 |
| F034 | 25 | T | S01 |
| F035 | 25 | T | S01 |
| F036 | 25 | T | S01 |
| F037 | 25 | T | S01 |

RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

| | | | |
|------|----|---|-----|
| F038 | 25 | T | S01 |
| F039 | 25 | T | S01 |
| | | | |
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| K002 | 25 | T | S01 |
| K003 | 25 | T | S01 |
| K004 | 25 | T | S01 |
| K005 | 25 | T | S01 |
| K006 | 25 | T | S01 |
| K007 | 25 | T | S01 |
| K008 | 25 | T | S01 |
| K009 | 25 | T | S01 |
| K010 | 25 | T | S01 |
| K011 | 25 | T | S01 |
| K012 | 25 | T | S01 |
| K013 | 25 | T | S01 |
| K014 | 25 | T | S01 |
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| K016 | 25 | T | S01 |
| K017 | 25 | T | S01 |
| K018 | 25 | T | S01 |
| K019 | 25 | T | S01 |
| K020 | 25 | T | S01 |
| K021 | 25 | T | S01 |
| K022 | 25 | T | S01 |
| K023 | 25 | T | S01 |
| K024 | 25 | T | S01 |
| K025 | 25 | T | S01 |
| K026 | 25 | T | S01 |
| K027 | 25 | T | S01 |
| K028 | 25 | T | S01 |
| K029 | 25 | T | S01 |
| K030 | 25 | T | S01 |
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| K032 | 25 | T | S01 |
| K033 | 25 | T | S01 |
| K034 | 25 | T | S01 |
| K035 | 25 | T | S01 |
| K036 | 25 | T | S01 |

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| K040 | 25 | T | S01 |
| K041 | 25 | T | S01 |
| K042 | 25 | T | S01 |
| K043 | 25 | T | S01 |
| K044 | 25 | T | S01 |
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| K046 | 25 | T | S01 |
| K047 | 25 | T | S01 |
| K048 | 25 | T | S01 |
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| K076 | 25 | T | S01 |
| K077 | 25 | T | S01 |
| K078 | 25 | T | S01 |
| K079 | 25 | T | S01 |

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| K082 | 25 | T | S01 |
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| K084 | 25 | T | S01 |
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| K101 | 25 | T | S01 |
| K102 | 25 | T | S01 |
| K103 | 25 | T | S01 |
| K104 | 25 | T | S01 |
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| K120 | 25 | T | S01 |
| K121 | 25 | T | S01 |
| K122 | 25 | T | S01 |

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| K124 | 25 | T | S01 |
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| K132 | 25 | T | S01 |
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| K134 | 25 | T | S01 |
| K135 | 25 | T | S01 |
| K136 | 25 | T | S01 |
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| P113 | 2 | T | S01 |
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| P115 | 2 | T | S01 |

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| P123 | 2 | T | S01 |
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| U163 | 2 | T | S01 |

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| U206 | 2 | T | S01 |

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| U213 | 2 | T | S01 |
| U214 | 2 | T | S01 |
| U215 | 2 | T | S01 |
| U216 | 2 | T | S01 |
| U217 | 2 | T | S01 |
| U218 | 2 | T | S01 |
| U219 | 2 | T | S01 |
| U220 | 2 | T | S01 |
| U221 | 2 | T | S01 |
| U222 | 2 | T | S01 |
| U223 | 2 | T | S01 |
| U224 | 2 | T | S01 |
| U225 | 2 | T | S01 |
| U226 | 2 | T | S01 |
| U227 | 2 | T | S01 |
| U228 | 2 | T | S01 |
| U229 | 2 | T | S01 |
| U230 | 2 | T | S01 |
| U231 | 2 | T | S01 |
| U232 | 2 | T | S01 |
| U233 | 2 | T | S01 |
| U234 | 2 | T | S01 |
| U235 | 2 | T | S01 |
| U236 | 2 | T | S01 |
| U237 | 2 | T | S01 |
| U238 | 2 | T | S01 |
| U239 | 2 | T | S01 |
| U240 | 2 | T | S01 |
| U241 | 2 | T | S01 |
| U242 | 2 | T | S01 |
| U243 | 2 | T | S01 |
| U244 | 2 | T | S01 |
| U245 | 2 | T | S01 |
| U246 | 2 | T | S01 |
| U247 | 2 | T | S01 |
| U248 | 2 | T | S01 |
| U249 | 2 | T | S01 |

WASTE ANALYSIS PLAN [40 CFR 270.14(b)(3)]

Introduction

The following information on Waste Analysis Plan (**WAP**) is being provided to the New Mexico Environment Department (**NMED**) by Rinchem Company Inc., (**Rinchem**) in accordance with the requirements of the New Mexico Hazardous Waste Management Regulations 20.4.1.500 NMAC, incorporation 40 CFR §264.13, pursuant to 20.4.1.900 NMAC, incorporating 40 CFR §270.14(b)(2-3).

This WAP provides information about how Rinchem plans to accept, manage, and store hazardous wastes at their Albuquerque Container Storage Facility (**the Facility**) in order to meet the requirements of New Mexico Hazardous Waste Management Regulations 20.4.1NMAC, which incorporate by reference 40 CFR Parts 260 through 270. The WAP shall be included in the operation record that Rinchem shall keep on-site at the facility. The RCRA Hazardous Waste Codes that Rinchem shall be accepting for management, storage and subsequent transfer to a disposal facility are listed above in **Table 1: Hazardous Waste Codes Accepted at Rinchem.**

The procedures in the current WAP pertain to wastes that Rinchem will accept from off-site sources domestically and foreign sources. The only difference will be for waste coming from a foreign source, is that, Rinchem shall notify NMED in writing at least four weeks in advance of the date of the first shipment of hazardous waste from a new foreign waste stream is expected to arrive at the facility. The notification will be made for each different waste stream from each foreign source. Rinchem shall obtain a Permit from the EPA before it can accept hazardous waste from a foreign source.

The form that will be used for acceptance for both domestic and foreign waste streams is attached as **Form F-1: Waste Profile Form.**

Waste Characterization

In order to safely manage and store hazardous wastes Rinchem shall correctly characterize each hazardous waste stream. The characterization of each waste stream will be documented on the Waste Profile Sheet.

Rinchem can use one or a combination of the following three methods to characterize the hazardous waste they accept for management and storage before subsequent transfer to a permitted waste disposal facility:

1. Acceptable Knowledge of Process (**KOP**) and published information such as Material Safety Data Sheets.
2. Detailed Chemical Analysis provided by Generator or Rinchem will obtain analysis.
3. Chemical Fingerprint Checks

Knowledge of process (KOP): is the knowledge that a generator has about the waste, such as the chemical composition and content of the waste and the process that produced the waste. This

knowledge helps with the determination of the waste characterization and is sufficient to determine both the hazards associated with management and storage and the requirements and restrictions for disposal. Existing published or documented data such as Material Safety Data Sheets (**MSDS**) on the hazardous waste or waste produced from similar processes can also be used.

Chemical Analysis: When Knowledge Of Process is not adequate for determination of the safe management and storage procedures for the hazardous waste, Rinchem can either accept from the generator detailed analysis from a certified laboratory or Rinchem can submit a sample of the waste stream to a qualified laboratory with proper QA/QC procedures in place to perform a detailed chemical analysis of the waste stream. The sample shall be sent to the lab together with a chain of custody form. The containers and preservatives used for the sample shall be specified by the lab doing the analysis. Testing parameters shall be chosen based on knowledge of the process from which the waste was produced and the information that the analysis yields about the waste, for example, BTU values, flashpoint, etc. The test methods that shall be used shall be those described in the most current version of EPA's publication titled "Test Methods for Evaluation Solid Waste, Physical/Chemical Methods, SW-846" or comparable methods.

Chemical Fingerprint Checks: Rinchem shall select specific parameters using Knowledge of Process information from the generator or any other applicable information about the characteristics of the waste. A chemical fingerprint check can also be performed on each incoming waste stream excluding labpacks and highly reactive wastes, to verify that the characteristics of the waste stream shall be consistent with the information provided by the generator and with the parameters listed on the profile for that waste stream. Fingerprint procedures shall be conducted according to published methods such as most current version of Turkington, or equivalent. The fingerprint parameters that may be tested or observed include:

- Physical state,
- Physical description,
- pH,
- Color,
- Ignitability,
- Specific gravity

The above parameters shall be selected not only for the fact that they shall indicate that the waste is actually what the generator claims that it is, but they shall provide sufficient information about the waste so that it can be properly managed, stored and disposed of in a safe manner.

Pre-acceptance of a Waste Stream

For each new hazardous waste stream that is a candidate for storage at the Rinchem Facility, the following procedures shall be followed prior to notifying a generator that a waste stream can be accepted at the Rinchem facility:

1. The generator shall provide pertinent chemical and physical data requested on the waste profile sheet. Please see **Form F-1-Waste Profile Form**. The profile includes a certification that any knowledge of waste submitted as part of the waste acceptance process shall be representative of the waste stream of interest, and that the generators shall notify Rinchem of known changes in the waste stream.
2. The generator shall provide Rinchem pertinent chemical and physical data and certifications requested to satisfy the land disposal restrictions (**LDR**) requirements specified under 20.4.1.800 NMAC, incorporating 40 CFR 268.
3. The data on the waste profile shall be verified as necessary through generator process knowledge, chemical fingerprint checks or detailed chemical analysis of a representative sample of the waste.
4. Once the data supplied by the generator has been verified, and Rinchem is assured that all the information which must be known to manage, store and dispose of the waste in accordance with New Mexico Hazardous Waste Management Regulations 20.4.1.500 NMAC, incorporating 40 CFR §264 and 20.4.1.800 NMAC., pursuant to §268, Rinchem shall determine the acceptability of the waste based on the requirements of the regulations and this Permit.

Physical Acceptance of Waste at the Facility

Except in the case of labpacks and highly reactive wastes, upon arrival of a waste shipment at the Facility, a determination shall be made to ensure that the customer had sent what was profiled and accepted.

1. Verification shall be made that a pre-acceptance inspection sheet (**PAIS**) has been filled out for the generator's shipment of waste. An example of what a PAIS might contain is attached herein as **Form-2: PAIS Form** of this Waste Analysis Plan.
2. The manifest and LDR form shall be compared with the profile (which shall be kept in the facility office) to make sure that they match. Some of the items that shall be compared include the waste description and the U.S. Department of Transportation (**DOT**) shipping information.
3. Using the attached **Form 3: QAQC Receiving Form**:
 - a. A fingerprint analysis may be performed, which shall provide reasonable assurance that the waste shipped from the generator agrees with the accompanying manifest.
 - b. If Rinchem has assisted the generator in waste stream characterization, packaging at the generator site and transport of the waste to the Facility; the data collected by Rinchem will be sufficient evidence in lieu of QAQC during physical acceptance of waste at the Facility. The data collected will be on file in the Facility Office.
 - c. Any discrepancies from the original profile will be documented on the QAQC Receiving Form and the generator will be notified of the discrepancies. At this time, it will be determined between Rinchem and the generator of the resolution and documented on the QAQC Receiving Form.

The minimum number of containers that shall go through the QAQC Check from each shipment of a waste stream shall be determined according to the cube root procedure, Method D 140-70 of the American Society for Testing and Materials (**ASTM**).

For a typical load, the cube root procedure and formula provide the following:

| NUMBER OF DRUMS RECEIVED | NUMBER OF DRUMS SAMPLED |
|--------------------------|-------------------------|
| 1 | 1 |
| 2-8 | 2 |
| 9-27 | 3 |
| 28-64 | 4 |
| 65-125 | 5 |

The hazardous waste drums to be checked shall be chosen at random by the person taking the samples. The QAQC shall take place in a well ventilated area of the Facility such as the dock.

One of the methods referred to in 20.4.1.200 NMAC, incorporating 40 CFR §261, Appendix I, or an equivalent procedure approved by NMED shall be used to obtain representative samples of the waste by employees wearing personal protective equipment (**PPE**). Typically, the employee's PPE shall include goggles or safety glasses, gloves and an apron or coveralls. Rinchem's Health and Safety Plan shall be followed.

The method of sampling that shall most frequently be used, unless the technology changes, shall be sampling of containerized liquid waste with a "Composite Liquid Waste Sampler (**COLIWASA**). The COLIWASA is an effective representative sampler for homogeneous and multilayer liquids. Disposable glass COLIWASAs shall be used except when sampling hydrofluoric acid and strong alkali solutions, when a teflon one shall be used. A separate COLIWASA shall be used to sample each container.

Some of the hazardous wastes received at the facility shall be labpacks of small quantity chemical wastes which can be categorized into several types:

- Excess or residual reagent chemicals
- Off-specification or expired chemicals
- Relatively small quantities of chemical solutions or mixtures of known composition
- Laboratory solid waste material

In most cases, knowledge of process and MSDS's may be sufficient to determine both the hazards associated with the management and storage of labpack wastes and the requirements and restrictions for its disposal; therefore, analytical testing may not be conducted on these wastes. The cube root

procedure mentioned above shall be used to determine the number of containers in each labpack waste stream that shall be inspected for conformity of the Labpack Inventory Sheet with the container contents. Further management of labpacks may include the consolidation of compatible chemicals from multiple generators into one container to ensure the best disposal cost with the final disposal facility.

In the case of highly reactive wastes being shipped for treatment at other off-site treatment, storage, and disposal facilities, the inspection process may entail no more than inspecting the container for proper packaging and labeling in order to protect the employees.

Unacceptable Waste Shipments

The Hazardous Waste Coordinator or his Designee shall qualify a waste shipment as unacceptable when any of the following conditions exists:

- Failure of the generator to pre-qualify the waste stream or provide appropriate data;
- Waste shipments that contain components that Rinchem is prohibited from accepting for storage and disposal;
- Improper or inappropriate packaging, labeling, or manifesting;
- Characteristics quantity or composition discrepancy between the waste and the waste manifest or profile;

The Hazardous Waste Coordinator (or Designee) must also classify the waste as unacceptable by Rinchem if it is significantly different in composition or volume from the information shown on the waste profile sheet, the pre-acceptance analytical data of the representative sample, or on the manifest. Containers shall be counted to determine any waste quantity discrepancies.

Wastes found to be in non-conformance shall be rejected on the spot or they may be reevaluated for possible acceptance by the Facility despite the variance. Rinchem's reevaluation procedures shall be designed to determine whether a waste material can be handled at the facility and whether the generator concurs with the characterization conducted by the Facility. The Hazardous Waste Coordinator shall evaluate the hazardous waste shipment brought to the Facility using the following criteria:

- Rinchem Company Inc./Facility requirements
- Discussions with the generator regarding the discrepancy
- facility parameters for waste storage
- the need for additional supplemental analysis

If all of the above parameters, including supplemental chemical analytical data indicate that the waste can be accepted and the generator concurs, new manifests or profiles shall be created as necessary to ensure compliance. If a discrepancy cannot be resolved within 15 days of the hazardous waste shipment receipt, the waste shall be returned to the generator and NMED shall be notified in writing of the discrepancy and the attempts to reconcile it.

Waste Tracking and the Operating Record

Rinchem shall maintain a written record and a computerized system of all manifested wastes that enter the Facility, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.73(a). This operating log shall contain the following:

1. A listing of all manifested wastes being received and shipped,
2. The location of waste within the Facility storage rooms,
3. The quantity and description of the wastes, the name of the generator, and the final destination of the waste.
4. All waste profiles delivered to Rinchem, waste acceptance and QA/QC forms.

Once a waste shipment has been analyzed and accepted, the containers in the shipment shall be appropriately marked/labeled so that they can be tracked within the Facility. The containers shall be moved to the appropriate storage area based on the hazard class and compatibility of the waste.

Analysis Review

The pre-acceptance evaluation of a hazardous waste stream shall be repeated when a generator notifies Rinchem that the process generating the waste has changed or if Rinchem has reason to suspect that the waste is not in conformance with available pre-acceptance documentation. In the case of a change in the process generating the waste, the generator must submit a new waste profile sheet and sample data. The waste stream shall also be re-analyzed by Rinchem if a waste shipment received at the Facility does not match the waste designated on the accompanying manifest or shipping paper.

Form 2: PAIS Form



**Attachment 1
 PRE-ACCEPTANCE INSPECTION SHEET
 FOR HAZARDOUS, TOXIC AND SPECIAL WASTE
 (RCRA, TSCA AND SWMR Regulated)**

Generator Name: _____
 State Manifest Document Number (if blank, use # in Block 4): XXXXXXXXX _____

Note: Read each line item and verify that it is acceptable before checking off.

1. Before signing the manifest, confirm the number of containers of each stream
2. Check manifest for information filled out according to instructions (dates signatures)
3. Check for appropriate DOT hazard labels and markings
4. Ensure all inappropriate labeling and marking are removed or painted out
5. Check drums/containers for the following:
 - a. DOT approved containers with proper UN markings only (check for DOT stamp on odd looking drums - Hazmat only)
 - b. Appropriateness for material (closed head drum - liquids, metal drum - organics, poly/poly-lined drum - corrosives, bags/boxes - solids)
 - c. No leaks or stains, bungs or rings sealed, no deep dents or creases, no open bags/boxes, generator states (and no evidence to contradict) filled at least 24 hours before pickup of shipment. (Hazmat only)
 - d. No liquids or dried waste on exterior (including top)
 - e. No evidence of inadequate headspace. (Hazmat only)
6. Check wooden pallet condition for broken boards/protruding nails

Line item record of problems and resolution (use other side if necessary):

It is vital to be firm but very courteous when dealing with customers regarding suspected discrepancies. If they don't readily agree that changes are necessary, ask for permission to contact your supervisor. We do not reject shipments without every effort to rectify non-compliance and we do not accept shipments until they comply.

| Inspector Name (Print) | CSC Date | Time | | |
|---------------------------|----------|--------|------------------|--------------------------|
| | | In/Out | | |
| | | | Initial Pickup | <input type="checkbox"/> |
| | | | CSC load & count | <input type="checkbox"/> |
| | | | CSC load & count | <input type="checkbox"/> |
| | | | CSC load & count | <input type="checkbox"/> |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Form 3: QAQC Receiving Form:

**Rinchem Company, Inc.
 Quality Assurance/Quality Control Report
 (Per Waste Stream)**

Profile Number: RC8810 TSDF: Rinchem Company, Inc. Date: 08/07/2011

Generator: _____ Manifest Number: XXXXXXXXXX

Generator Address: _____ Phone: _____

Waste Name: _____

Transporter: Rinchem Company, Inc. Quantity: _____ Container Type & Size: _____

EPA Waste Codes: _____

Waste Characteristics (according to profile):

Discrepancies:

pH: _____

pH: _____

Specific Gravity: _____

Specific Gravity: _____

Flash Point: _____

Flash Point: _____

Layers: _____

Layers: _____

Color: _____

Color: _____

Comments: _____

Have the discrepancies been resolved? Yes No

Who contacted the generator? _____

Who was called? _____

What was decided? _____

| Barcode | Weight | Location | Barcode | Weight | Location |
|---------|--------|----------|---------|--------|----------|
| | | | | | |
| | | | | | |
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SECURITY PLAN [40CFR 270.14(b)(4)]

The following information is being provided to the New Mexico Environment Department (NMED), by Rinchem Company Inc. (**the Facility**), in accordance with the requirements of the New Mexico Hazardous Waste Management Regulations 20.4.1.500 NMAC, incorporating 40 CFR §264.14.

Security at the Rinchem Container Storage Facility (**Facility**) shall be accomplished by a 24 hour monitored alarm system, fences surrounding the facility, and warning signs.

Barrier and Means to Control Entrance

Rinchem employs a number of measures to ensure adequate security in order to assure the protection of the Facility from entry by unauthorized personnel, livestock and wildlife.

The Facility has a security alarm system that is connected to each perimeter door of the Facility, glass breaks sensors on windows, motion detectors in office area, the fire suppression system, and the pull stations. This security alarm system is monitored 24 hours a day by an outside security company. A list of Rinchem employee names and phone numbers to contact is kept at this monitoring company should an emergency occur.

The entire Facility, including the outside area around the Rinchem building is maintained in a secure manner. A fence encompasses the entire Facility, which is a chain link fence constructed with razor wire along the top of the entire fence. The fence, gates, and the security alarm system, provide adequate access control and shall prevent unknowing entry of unauthorized persons, livestock or wildlife into the Facility.

All gates shall be maintained in a closed and locked condition during all periods of Facility non-working hours. All critical locks and the alarm codes shall be changed when a Facility employee leaves the company or when a key is lost. During working hours, the gates shall be kept closed or shall be observed by Facility personnel. Access through the main truck loading/unloading gate is blocked by a barrier with a sign informing the truck drivers to check in with the office before entering. The customer service representatives seated immediately inside the office entrance door confirms identification of all visitors and the purpose of their visit. Visitors shall not be allowed in the warehouse without an employee accompanying them. All visitors shall be required to sign a visitors log prior to movement in or around the Facility. Each visitor will be issued a security badge which must be worn while the visitor is on site. The security escort or guide is responsible for ensuring that all visitors comply with the requirements.

Description of Warning Signs

Warning signs shall be posted at all of the Facility gates and several other fence locations around the warehouse in such a manner as to be visible from all angles of approach. The warning signs shall be posted every 50 feet along the perimeter fence of the Facility. These signs shall be legible from a distance of at least 25 feet. These signs shall be printed in both **English** and **Spanish** to read as follows:

“DANGER - UNAUTHORIZED PERSONS KEEP OUT”. Warning signs in Spanish shall be posted next to or below the English warning signs and bear the legend **“PELIGRO-PERSONAS SIN AUTORIZACION NO ENTRADA.”** These signs shall also be posted at the Facility entry points and where the perimeter fence approaches streets or active areas of the Facility.

INSPECTION PLAN [40 CFR 70.14 (b)(5)]

Introduction

This section provides information on Rinchem Company, Inc.’s (**Rinchem**) Container Storage Facility (**the Facility**), as required by the New Mexico Hazardous Waste Management Regulations 20.4.1.500 NMAC, incorporating 40 CFR §264.15, and 20.4.1.900 NMAC, as incorporated at 40 CFR §270.14(b)(5).

Rinchem Company, Inc. personnel shall conduct regular inspections of all equipment and structures to prevent, detect, or respond to environmental or human health hazards. Inspection records shall be kept at the Facility for three years from the date of the inspection. The inspections shall cover malfunctions, deteriorations, operator errors, and discharges that may cause or lead to a release of hazardous waste constituents to the environment or may pose a threat to human health.

The container storage Facility personnel shall receive general training concerning hazardous waste inspections as part of Rinchem’s hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the facility shall receive on-the-job training in inspection procedures. Inspection procedures shall be kept as part of the operating record located at the Facility.

Rinchem’s personnel shall make daily rounds of the facility to detect any unauthorized entry to the Facility or any other abnormalities. The designated personnel shall not use inspection checklists, but they shall notify the Emergency Coordinator (EC) and/or emergency response personnel of any spills or other emergencies. Inspection Schedule and Checklist

Attached are the forms that will be used to perform the required inspections. These Inspection Forms include logs for the regular 5 day work week, quarterly, semi-annual and annual schedules, ensuring that inspections occur at appropriate frequencies. The items to be inspected shall be placed on the schedule that is appropriate for the frequency of inspection to be performed. There is a section on each form for recording the name of the inspector, the date of the inspection, the nature of repairs performed and/or remedial action taken, with comments. The schedules shall be maintained and kept at the Facility. The forms are attached as follows:

- INSPECTION FORM 1: DAILY INSPECTION
- INSPECTION FORM 2: QUARTERLY INSPECTION
- INSPECTION FORM 3: SEMI-ANNUAL INSPECTION
- INSPECTION FORM 4: ANNUAL INSPECTION



RINCHEM COMPANY, INC.
 CHEMICAL MANAGEMENT SERVICES
DAILY Inspection Sheet

Inspector _____ CSC _____ Date of Inspection _____ Time of Inspection _____

Inspector Signature _____

| ITEM | CRITERIA/OBSERVATIONS | STATUS (A) Acceptable (U) Unacceptable | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION AND COMMENTS |
|--|--|--|---|
| <u>Container Loading/ Unloading Area</u> | - Check that no containers of hazardous waste are left open or exposed overnight | _____ | _____ |
| | - Check for evidence of spilled material on concrete below truck and on dock | _____ | _____ |
| | - Check for debris and refuse | _____ | _____ |
| <u>Container Storage Area</u> | - Check for evidence of spilled material on concrete floor & drains | _____ | _____ |
| | - Check for debris and refuse | _____ | _____ |
| | - Check for adequacy of aisle space | _____ | _____ |
| <u>Stored Containers</u> | - Check for container leaks or swelling | _____ | _____ |
| | - Check that containers are not open | _____ | _____ |
| | - Check for proper placement | _____ | _____ |
| <u>Security Equipment</u> | - Check that alarm is working | _____ | _____ |
| | - Check that gates close properly and locks are in working order | _____ | _____ |



RINCEM COMPANY, INC.
 CHEMICAL MANAGEMENT SERVICES
DAILY Inspection Sheet

Inspector _____ CSC _____ Date of Inspection _____ Time of Inspection _____
 Inspector Signature _____

| ITEM | CRITERIA/OBSERVATIONS | STATUS (A) Acceptable (U) Unacceptable | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION AND COMMENTS |
|--------------------------------|---------------------------------------|--|---|
| <u>Communication Equipment</u> | | | |
| Telephones | - Check that access is not blocked | _____ | _____ |
| Pull Stations | - Check that access is not blocked | _____ | _____ |
| <u>Emergency Equipment</u> | | | |
| Fire Extinguishers | - Check that access is not blocked | _____ | _____ |
| Eye Wash/Showers | - Check that access is not blocked | _____ | _____ |
| Exits | - Check that access is not blocked | _____ | _____ |
| <u>Safety Equipment</u> | | | |
| Emergency Shower/ Eyewash | - Check water pressure (Check Weekly) | _____ | _____ |
| | - Check for leaks | _____ | _____ |

I certify that the above recommended action has been taken on items mentioned and/or defective items are now satisfactory.

Supervisor _____ Date _____



QUARTERLY Inspection Sheet

Inspector _____ CSC _____ Date of Inspection _____ Time of Inspection _____

Inspector Signature _____

| ITEM | CRITERIA/OBSERVATIONS | STATUS (A) Acceptable (U) Unacceptable | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION AND COMMENTS |
|-------------------------|---|--|---|
| <u>Safety Equipment</u> | | | |
| Protective Glasses | - Check if broken | _____ | _____ |
| | - Check for adequate supply for employees/ Visitors | _____ | _____ |
| First Aid Equipment | -Check that all necessary items are present | _____ | _____ |
| Protective Clothing | - Check for holes, wear and tear | _____ | _____ |
| | -Check for adequate number of sets of Protective clothing | _____ | _____ |
| Respirator | - Check for adequate number of cartridges for respirator | _____ | _____ |
| | - Check that all respirators are in good working condition | _____ | _____ |

Inspector _____ CSC _____ Date of Inspection _____ Time of Inspection _____

Inspector Signature _____



RINCHEM COMPANY, INC.
 CHEMICAL MANAGEMENT SERVICES
QUARTERLY Inspection Sheet

| ITEM | CRITERIA/OBSERVATIONS | STATUS (A) Acceptable (U) Unacceptable | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION AND COMMENTS |
|---|---|--|---|
| <u>Container Loading/ Unloading</u> | <ul style="list-style-type: none"> - Check dock leveler for proper adjustment, operation and corrosion - Check for condition and availability of overpack and open head drums | <p>_____</p> <p>_____</p> | <p>_____</p> <p>_____</p> |
| <u>Security Equipment</u> | | | |
| Gates | - Check for damage or corrosion | _____ | _____ |
| Facility Fence | <ul style="list-style-type: none"> - Check for corrosion - Check fence for broken wire | <p>_____</p> <p>_____</p> | <p>_____</p> <p>_____</p> |
| Signs | <ul style="list-style-type: none"> - Check that signs are present (English and Spanish) - Check that signs are legible- not defective, readable at 25 feet | <p>_____</p> <p>_____</p> | <p>_____</p> <p>_____</p> |
| Lighting | - Check to make sure all lights are working (no defective bulbs) | _____ | _____ |

Inspector _____ CSC _____ Date of Inspection _____ Time of Inspection _____

Inspector Signature _____



QUARTERLY Inspection Sheet

| ITEM | CRITERIA/OBSERVATIONS | STATUS (A) Acceptable (U) Unacceptable | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION AND COMMENTS |
|---------------------------------------|--|--|---|
| <u>Emergency Equipment</u> | | | |
| Fire Extinguishers | - Check pressure gauge for full charge Indication | _____ | _____ |
| | - Check inspection log to ensure monthly Inspections by outside service are current | _____ | _____ |
| | -Check seal to ensure extinguisher has not been used | _____ | _____ |
| Absorbents | - Check for accessibility | _____ | _____ |
| | - Check for adequate supply | _____ | _____ |
| Self-Contained Breathing Apparatus | - Check if tanks are charged | _____ | _____ |
| | - Check if leaks in tanks are present | _____ | _____ |
| | - Check if supplied air respirators are inspected monthly | _____ | _____ |

Inspector _____ CSC _____ Date of Inspection _____ Time of Inspection _____

**RINCEM COMPANY, INC.**
CHEMICAL MANAGEMENT SERVICES
QUARTERLY Inspection Sheet

Inspector Signature _____

| ITEM | CRITERIA/OBSERVATIONS | STATUS (A) Acceptable (U) Unacceptable | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION AND COMMENTS |
|-------------------|---|---|---|
| <u>Spill Cart</u> | - Check if all necessary items are present in accordance with the inventory checklist | _____ | _____ |

I certify that the above recommended action has been taken on items mentioned and/ or defective items are now satisfactory.

Supervisor _____ Date _____



RINCHEM COMPANY, INC.
 CHEMICAL MANAGEMENT SERVICES
SEMI-ANNUAL Inspection Sheet

Inspector _____ CSC _____ Date of Inspection _____ Time of Inspection _____

Inspector Signature _____

| ITEM | CRITERIA/OBSERVATIONS | STATUS (A) Acceptable (U) Unacceptable | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION AND COMMENTS |
|------------------------------|--|--|---|
| <u>Forklift</u> | -Check logbook to see if complete safety checkup done by outside service company is complete | _____ | _____ |
| <u>Spill Collection Tank</u> | - Check for presence of material in tank - Check soundness of tank | _____ | _____ |
| | | _____ | _____ |

I certify that the above recommended action has been taken on items mentioned and/or defective items are now satisfactory.

Supervisor _____ Date _____



RINCEM COMPANY, INC.
 CHEMICAL MANAGEMENT SERVICES
ANNUAL Inspection Sheet

Inspector _____ CSC _____ Date of Inspection _____ Time of Inspection _____

Inspector Signature _____

| ITEM | CRITERIA/OBSERVATIONS | STATUS (A) Acceptable (U) Unacceptable | DATE AND NATURE OF REPAIRS/ REMEDIAL ACTION AND COMMENTS |
|--------------------------------|---|--|---|
| <u>Overhead Door</u> | - Check logbook to see if complete safety checkup done by outside service company is complete | _____ | _____ |
| <u>Fire Suppression System</u> | - Check logbook to see if complete safety checkup done by outside service company is complete | _____ | _____ |

I certify that the above recommended action has been taken on items mentioned above and/or defective items are now satisfactory.

Supervisor _____ Date _____

CONTINGENCY PLAN [40 CFR 270.14 (b)(7)]

RINCHEM COMPANY, INC: CONTINGENCY PLAN: [40 CFR 270.14(b)(7)]

Introduction

This contingency plan is designed to minimize hazards from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at, and around Rinchem Company, Inc.'s (**Rinchem**) Container Storage Facility (**the Facility**). The provisions of the plan shall be carried out immediately whenever there is a threat to human health or the environment.

Distribution and Amendment of the Plan

The most current version of the contingency plan shall be maintained at the Facility and copies shall be distributed to:

1. Bernalillo County Sheriff's Department
2. Bernalillo County Fire Department
3. State Emergency Response Team
4. Lovelace's Women's Hospital

This plan shall be subject to review and amendment if any of the following occurs:

1. The plan fails in an emergency;
2. The Facility's permit is revised;
3. Changes in the Facility increase the potential for fires, explosions, or releases of hazardous waste or alter the response necessary in an emergency. The list of emergency coordinators changes;
4. The list of emergency equipment changes.

Arrangements with Local Authorities

Appropriate local authorities have toured the Facility and are familiar with the Facility layout, possible evacuation routes, the general operations of the Facility and the properties and hazards of the waste handled at the Facility. In case of an emergency at the facility, such as a fire or hazardous material disaster, Rinchem has already made an arrangement with local authorities. The Senior Operating Fire Department personnel shall assume command of the field of Incident Commander and provide direct assistance, planning and information control to the scene. The City of Albuquerque and Bernalillo County Fire Departments shall coordinate joint use of all fire protection services.

Arrangements shall be made with Lovelace's Women's Hospital to familiarize them with the properties of the hazardous waste handled at the Facility and the types of injuries or illnesses which could result from fires, explosions or releases at the Facility. If a Rinchem employee needs to be treated, the hospital and the ambulance service, if any is being used, shall be informed ahead of time, as much as possible, the nature of the injury and any contamination involved.

Emergency Coordinator

The Emergency Coordinator (**EC**) and appointed alternates at the Facility shall be thoroughly familiar with all aspects of the contingency plan, all operations and activities at the Facility, the location and characteristics of the wastes handled, the location of all records within the Facility and the Facility layout. The EC and the alternates shall also have the authority to commit the resources needed to carry out this contingency plan.

The EC or designated alternate shall always be on the premises or on-call and available to respond to an emergency by reaching the Facility within a short time. In the event all of them are out of reach on the same day, a surrogate shall be designated for that period of absence. **Table 2** shows the EC and designated alternate in descending order of priority.

A dated revised copy of **Table 2** shall be supplied to the New Mexico Environmental Department Hazardous Waste Bureau (**NMED**), on the effective date of change to the names, addresses or phone numbers on the EC list. Any updated **Table 2** sent to NMED shall be accompanied by a letter from Rinchem requesting replacement of the previous table in the permit. Periodic updates to **Table 2** shall be made through a Class 1 Permit modification.

TABLE 2

Rinchem Company, Inc.'s Emergency Coordinator and Alternate List

| EMERGENCY COORDINATOR | Address | Phone Numbers |
|---|---|--|
| Polly Wagner | 2540 Violeta Circle SE Rio Rancho, NM 87124 | Home: 505-797-7033 Cell: 505-681-4921 Work: 505-998-4143 |
| <i>1st Alternate:</i> Rob Goff | 10700 Academy Road, NE Apartment # 2327 Albuquerque, NM 87111 | Cell: 505-681-4984 Work: 505-998-4140 |
| <i>2nd Alternate:</i> Kenneth C. Sanchez | 226 La Cienega NW Albuquerque, NM 87107 | Home: 505-899-9010 Cell: 505-681-0863 Work: 505-998-4151 |

Facility Emergency Equipment

Table 3 is a list of the emergency equipment maintained at the Facility including the equipment's description/capabilities and location in the Facility. A dated revised copy of Table 3 shall be supplied to the New Mexico Environmental Department Hazardous Waste Bureau (**NMED**), and a request for Permit modification to incorporate the updated list.

TABLE 3: Emergency Equipment List

| EQUIPMENT | DESCRIPTION/ CAPABILITIES | LOCATION |
|---|--|---|
| FIRE CONTROL | | |
| Fire extinguishers | ABC fires | All fire extinguishers are located within 50 feet of flammable materials throughout the warehouse and on the forklifts. |
| Dry pipe foam | Foam sprinkler system | Under roof of whole warehouse |
| Sprinkler | Double fireman’s hookup | Warehouse rooms for extra foam injection if necessary |
| PERSONAL PROTECTION | | |
| Protective eyeglasses or goggles | Protect eyes from splashes | Office for visitors, employees keep own glasses |
| Face shields | Protect eyes and face | In PPE storage area. |
| SCBA’s | 30-minute air supply | In Technician Office Area/Room A. |
| Aprons, chemical resistant | Protect skin and clothing | In PPE storage area. |
| Gloves, assorted chemical and physical damage resistant | Protect skin from splashes and free liquids | <ol style="list-style-type: none"> 1. Part of Hazmat spill cart inventory located within the warehouse 2. In PPE storage area |
| Protective coveralls | Protect skin and clothing from hazardous waste | <ol style="list-style-type: none"> 1. Part of Hazmat spill cart inventory located within the warehouse 2. In PPE storage area |
| Boot shields | Protect skin from splashes and free liquids | <ol style="list-style-type: none"> 1. Part of Hazmat spill cart inventory located within the warehouse 2. In PPE storage area |
| SPILL CONTROL | | |

| | | |
|--|--|---|
| Absorbent | Spill containment | <ol style="list-style-type: none"> 1. Part of the Hazmat spill cart inventory located within the warehouse 2. Room E of Warehouse |
| Forklift | Moving/loading containers and heavy equipment | Warehouse area |
| Salvage drums | Over packing of damaged drums | South side of the warehouse and on the dock area. |
| Plastic (polyethylene) | Containment of hazardous spills | <ol style="list-style-type: none"> 1. Part of the Hazmat spill cart inventory located within the warehouse 2. Room E of Warehouse |
| Shovels | Used in cleaning up debris | <ol style="list-style-type: none"> 1. Part of the Hazmat spill cart inventory located within the warehouse 2. Front or Back Dock Area |
| Broom | Used in cleaning up debris | <ol style="list-style-type: none"> 1. Part of the Hazmat spill cart inventory located within the warehouse 2. Front or Back Dock Area |
| Duct tape | Used for temporary plugging of leaks | <ol style="list-style-type: none"> 1. Part of the Hazmat spill cart inventory located within the warehouse 2. Front or Back Dock Area |
| EMERGENCY DECONTAMINATION AND FIRST AID | | |
| Emergency shower/eyewash stations | Decontamination of skin, eyes, and/or clothing | There is 1 shower/eyewash in every room throughout the warehouse (with the exception of Technician Office Area/Room A. |
| First Aid station | First aid medical supplies | Located within the office area/Room A. |
| EMERGENCY COMMUNICATION AND ALARM SYSTEMS | | |
| Pull stations | Sounds the alarm and is connected to outside monitoring system | Front office, front dock |

| | | |
|-------------|---|---|
| Intercom | To communicate with personnel during an emergency | Accessible from all phones. Can be heard throughout the warehouse and office. |
| Alarm siren | To alert personnel of an emergency | Can be heard throughout warehouse |

EVACUATION PLAN

The EC, or designated alternate, is the only person authorized to call for complete evacuation of the site in response to an emergency situation which threatens the health and safety of the Facility personnel. She/he takes this action based on her/his analysis of the emergency situation. The following actions shall be taken when the EC orders a site evacuation:

- The EC shall pull the alarm and announce the evacuation over the intercom or by shouting.
- Each individual shall determine which route he or she will take depending on the location of the incident and his or her location at the time the alarm is sounded. The evacuation routes are shown in Facility layout attached at the end of this contingency plan.
- All personnel and visitors shall quickly leave the Facility in a safe manner. Customer service or administrative employees shall direct visitors off-site.
- Personnel shall re-group at the intersection of the road easement and Edith Boulevard. East of the Facility.
- A person designated by the EC shall initiate a head count of all the people at the regroup area. This information shall be give to the EC.

Notification of Situations Which Could Threaten Human Health or the Environment Outside of the Facility

If the Facility has had a release, fire or explosion which could threaten human health or the environment outside the Facility, the EC shall immediately inform the appropriate local authorities if her/his assessment indicates that evacuation of local areas may be advisable. She/he shall also be available to help appropriate officials decide whether the local areas should be evacuated.

The EC shall immediately inform either the government official designated as the on-scene coordinator for Rinchem’s geographical area or the Nation Response Center if the Facility has had a release of a reportable quantity, fire or explosion which could threaten human health or the environment outside the Facility. The report shall include:

1. Name and telephone number of reporter;
2. Name and address of the Facility;
3. Time and type of incident;
4. Name and quantity of material(s) involved, to the extent known;
5. The extent of injuries, if any; and
6. The possible hazards to human health or the environment outside the Facility.

Emergency Procedures

One of the first tasks performed by the EC in an actual or imminent emergency situation is to inform Facility personnel and to activate the evacuation plan if she deems it necessary. The EC shall also inform State or local agencies who have designated response roles if their help is needed.

Whenever there is a fire, explosion or release, the EC shall identify the extent of any released materials as well as the character, source and amount. The determination shall be made by observation, information gathered by other Facility personnel, review of Facility records or manifests and, if necessary, by chemical analysis.

The EC shall also assess the situation for possible hazards to human health and the environment that may result from a fire, explosion or release. Both direct and indirect effects such as a release of fumes, release of residues from fire-fighting activities, heat-induced explosions and contamination of soil or surface water shall be considered.

Prevention of Recurrence or Spreading of an Incident

During an emergency, the EC shall take reasonable measures necessary to ensure that a release, fire, or explosion does not occur, recur or spread to other hazardous waste at the Facility. Procedures that shall be carried out, when necessary, shall include:

1. Stopping processes or operations;
2. Collecting and containing released wastes;
3. Isolating or removing containers;
4. Inspecting for any leaks or cracks in containers; and
5. Ventilation of the building.

Post-Emergency Procedures

Once the emergency situation is under control, the EC shall initiate activities to store and prepare for treatment/disposal of the recovered waste, contaminated soil or surface water or any other material that results from a release, fire or explosion.

The EC shall ensure that no waste which may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed in the affected area(s) of the Facility. She/he shall also ensure that all emergency equipment is cleaned, examined for fitness of reuse and readied for future use. When a release of a reportable quantity has occurred, the owner or operator shall inform the Regional Administrator and NMED/State and local authorities that the Facility has completed the above tasks before operations are resumed in the affected area(s) of the Facility.

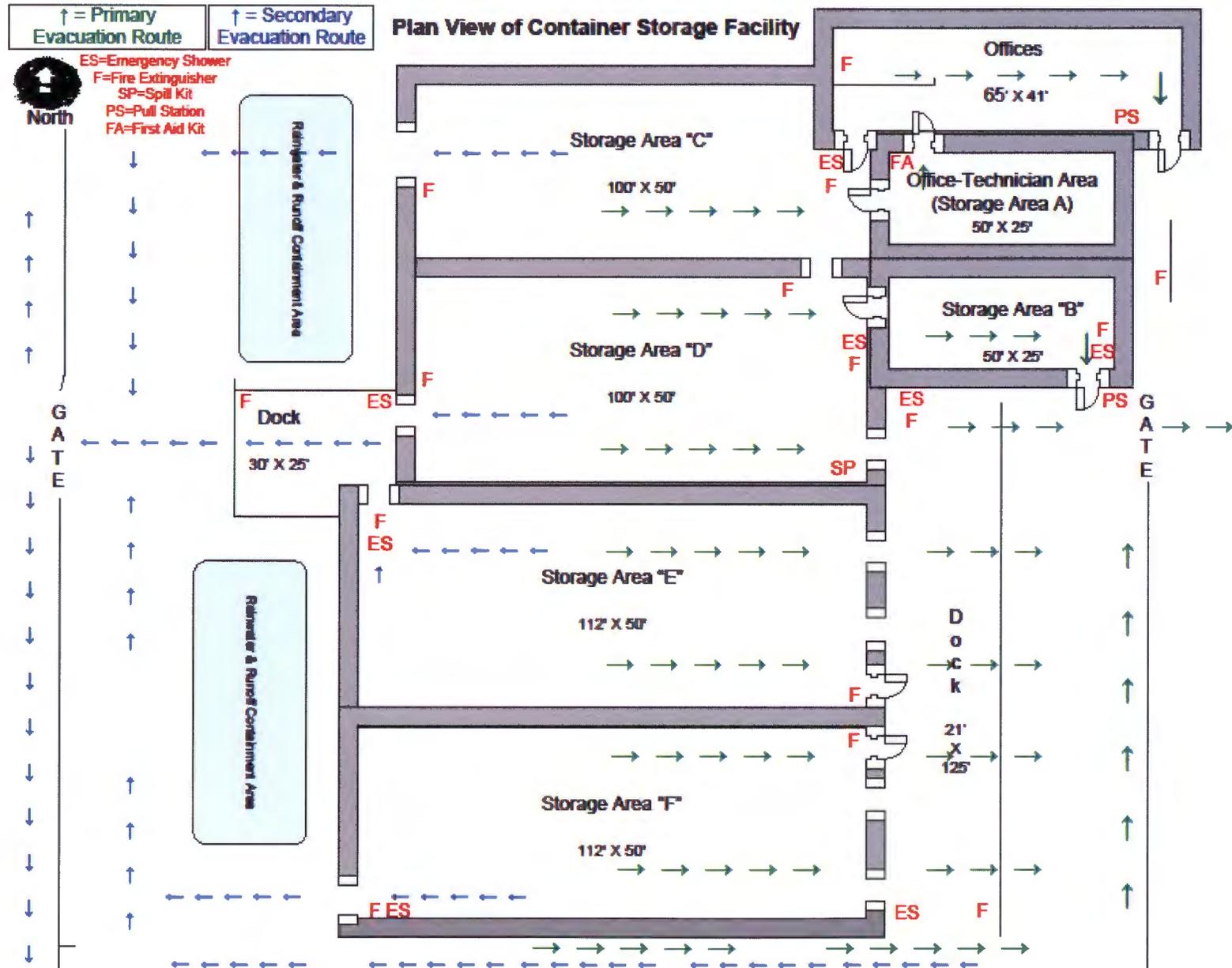
Recording of an Incident

It shall be noted in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 calendar days after the incident, a written report on the incident shall be submitted to the Secretary, NMED. The report shall include the following:

1. Name, address and telephone number of the owner or operator;
2. Name, address and telephone number of the Facility;

3. Date, time and type of incident (e.g., release, fire);
4. Name and quantity of material(s) involved;
5. The extent of injuries, if any;
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
7. The estimated quantity and disposition of recovered material that resulted from the incident.

Note: Please see attached facility layout referencing emergency routes in the case of evacuation.



PREPAREDNESS AND PREVENTION: [40CFR 270.14 (b)(8)]

Introduction

The Rinchem Company, Inc. (**Rinchem**) is operated using a variety of procedures and equipment that minimize the potential for various hazards. The number one priority at Rinchem is the protection of the employees and the environment.

Preventative Measures

Prevention of Hazards During Unloading

Unloading hazards shall be reduced through procedures, structural features and equipment used at the Facility. Containerized wastes shall be unloaded and loaded only at the truck dock which is equipped with mechanical dock levelers. All wastes that enter or leave the Facility shall be handled over the sloped and drained concrete containment pits of the loading dock. Small trucks shall drive over the berm onto the dock from the northeast side of the facility (along the northeast fence with the pedestrian gate). Larger trucks shall back up to the dock, parking on the sloped apron to the south that contains the concrete pits for containment. Both areas can contain a 1000-gallon spill.

Rinchem shall maintain hand trucks and safety-rated forklifts specifically designed for hazardous waste container carrying. Containers shall not be lifted more than a few inches above the bed of a trailer before the forklift can back away and lower the containers to a few inches above the floor of the loading dock. In this way, if a container were to be dropped, the distance of the fall would be minimized so that the structural integrity of the container would not be threatened.

Prevention of Flooding and Run-Off from Waste Handling Areas

Flooding of the hazardous waste storage building shall be prevented by the land under the building which is elevated five feet above the surrounding land. This allows any rain that might land near the building to flow away from, instead of towards, the building. Also, the building's roof is sloped and is equipped with a gutter system which allows the rainwater to flow from the Facility in a southwesterly direction into the catchment ponds located on either side of the back dock on the west side of the Facility.

Prevention of runoff from the waste handling areas shall be accomplished in several ways. The storage area for the hazardous waste is situated inside the building over sealed concrete floors that are sloped and bermed so in the event of a spill or other release the material is contained inside the building. Floors in storage area D of the building are sloped and drained to a waste containment tank located under the dock. All other waste handling areas such as the docks are paved with concrete and built with swales which provide secondary containment.

Prevention of Water Supply Contamination

All the measures discussed in the section above should help to decrease the chance of contamination of water supply. All waste handling shall be performed over concrete and any spills or leaks that do occur shall be cleaned up immediately. Also, the road around the building slopes to the west so that rainwater flows into the drainage ponds in the back of the building. This prevents the mixing of rainwater and any potential contamination from trucks at the dock.

Mitigation of Effects of Equipment Failures and/or Power Outage

Power outages and equipment failures do not create problems in the Facility for the following reasons:

- The storage section of the Facility is lighted only by skylights. The docks are equipped with explosion-proof electrical lighting. The forklifts are equipped with floodlights which allow for their safe use in the dark.
- In an emergency, pull stations shall be operable since the electronic alarm system is battery powered. Shouting would be the most effective means of warning employees to evacuate since the intercom will not work during a power outage.
- Emergency exit signs shall be self-illumination and visible without electric power.

Prevention of Undue Exposure of Personnel to Hazardous Waste

Training is the key to the prevention of employee exposure. All personnel at the Facility shall be trained in procedures for properly performing Facility operations including handling hazardous wastes and responding to emergency situations. Included in the training shall be instruction in the use and care of personal protection equipment and the location and use of safety showers and eyewash units which are located at strategic points throughout the warehouse.

All employees shall be provided with protective equipment which includes, but is not limited to, hard hats(job specific), eye protection, steeled-toed boots, respirators, protective overalls and chemically resistant aprons. Employees and visitors shall be required to wear eye protection in the warehouse, on the docks and in the yard at all times.

When transferring wastes or cleaning up hazardous waste spills is required, the worker(s) shall wear the appropriate personal protective equipment.

Prevention of Releases to the Atmosphere

In addition to the precautions taken at the Facility to prevent releases, Rinchem shall implement preventive procedures before the waste is transported to Facility. Before loading the containers of waste at a generator's site, the containers shall be checked for soundness, proper closure and labeling, and compliance with U.S. Department of Transportation (**DOT**) standards. Any damaged containers that might leak or burst during transporting or unloading shall not be accepted for transportation.

In the event of a leak or spill in the combustible storage area, storage area D, the waste shall be drained from the warehouse through the cast-iron pipe that leads to a water tight concrete-lined tank. This 500-gallon concrete tank is housed in a larger water tight concrete tank. Drainage into the tank allows very few vapors to be emitted into the atmosphere.

PRECAUTIONS FOR PREVENTION OF ACCIDENTAL IGNITION OR REACTION OF IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES [40 CFR 270.14(b)(9)]

The Facility has a combination of building design and procedural measures to prevent accidental ignition or reaction of ignitable, reactive or incompatible wastes. The first precaution taken shall be to ensure that the hazardous waste received is what is described on the generator's profile and the manifest accompanying the waste so that it can be stored properly. The procedures to accomplish this are described in the *Waste Analysis Plan*.

Containerized waste materials shall be stored only in closed DOT approved containers. These containers shall not be opened unless sampling or repackaging is necessary. Opening of containers shall be strictly prohibited in the storage areas. Sampling and transfer operations are prohibited inside the warehouse building unless there is positive local ventilation to the outside. Generally these operations shall be conducted on the docks.

The storage areas for the containers are inside the building. This allows protection of the waste from extreme heat, cold, and sunlight.

In order to decrease hazards caused by storing incompatible wastes, the building is designed to allow physical separation and secondary containment of incompatible materials. The storage portion of the Facility is separated into six sections by stem walls and cinderblock walls. Each area has sloped floors to contain any material within that area should a spill or leak occur. There are also ramps in between the storage areas to keep any spilled or leaked waste within the storage area. Routine inspections of containers and container storage areas shall be conducted to allow site personnel to detect a spill or leak quickly and to identify potential problems before they occur.

All storage containers holding hazardous waste that is incompatible with other wastes and materials shall be separated and protected from these wastes and materials by cinderblock walls, stem walls and ramps between the storage areas.

Sources of ignition shall be eliminated by several means. First, containers of flammable and combustible materials shall be stored in designated areas, away from electrical equipment. Second, electrical outlets shall not be located in the areas where these wastes are stored. The rooms are lit by sunlight coming through skylights in the roof. Third, all wiring and electrical equipment used around the waste storage areas (such as in the temperature control rooms and on the docks) is explosion proof. Rinchem's forklifts are designed and rated to prevent ignition of flammable vapors.

Smoking, and use of matches or lighters shall not be permitted anywhere in the Facility. "NO SMOKING" signs shall be posted at all entrances to the waste storage and handling areas, on Facility perimeter

fencing and other prominent places throughout the Facility. Welding, cutting and other high temperature operations shall not be allowed near the vicinity of the waste storage and handling areas unless proper precautions and planning are done and the work is approved by Rinchem.

Required Aisle Space

The Facility operators shall maintain sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the Facility operation in an emergency.

Each of the seven rooms comprising the Facility shall meet these requirements, as needed. The arrangement of containers in the staging area shall always be configured to meet aisle space requirements and to ensure that the forklifts, personnel, fire protection equipment, spill control equipment, and decontamination equipment can safely access the hazardous waste containers.

TRAFFIC [40 CFR 270.14(b)(10)]

There is only one street approach to the Facility. This entrance is located 600 feet west of Edith Blvd. All the trucks accessing the Facility approach from Edith Blvd. The trucks turn west onto a road and utility easement. This paved road is a private easement that is owned by RCI Properties. The Access road surface is three inches of asphalt over a six inch gravel base course which translates into a load-bearing capacity of fifty 18,000-pound single-axle loads per day over twenty years. The trucks proceed on this easement until they reach the gate of the Facility.

A stop sign and a sign informing the drivers that they must report to the office before proceeding further is at the gate to the loading/unloading dock. After receiving permission from the office, the gate is opened and the driver is escorted to the dock.

After leaving the Facility by way of the easement, the trucks stop at a stop sign that is located at the end of the easement immediately before turning onto Edith Blvd.

The Facility not only receives wastes, it warehouses chemicals for third party vendors. Tractor/trailers are used to receive chemicals as well as transport wastes. These trailers can be tank, flat or van trailers. The maximum axle weight for any of these rigs is 16,250 pounds and maximum gross weight is 80,000 pounds. Approximately 85 tractor/trailers per month enter and leave the Facility.

Smaller trucks are also used to transport chemicals to customers and to transport wastes. These trucks vary in weight but generally gross up to 32,000 pounds. Approximately 75 smaller trucks each month enter and leave the Facility.

FACILITY LOCATION INFORMATION [40 CFR 270.14 (b)(11)]

LEGAL DESCRIPTION

The legal description of the property as recorder in book C21 on page 80 filed in the office of the Bernalillo County Clerk is as follows:

Lot 4A-1 Subdivision of Lot 4A Edith Land Company, as the same is shown and designated on the Replat of Lot 4A, Edith Land Company, now comprising Lots 4A-1, 4A-2, filed in the Office of the County Clerk, New Mexico, on May 20, 1983.

The facility consists of an approximately 25,000 square foot warehouse and office, loading/unloading dock, a back dock and two rainwater containment areas.

Please see Appendix A for the following:

- **Figure 1** – General Location Map of the Facility
- **Figure 2** – Flood Insurance Rate Map
- **Figure 3** – Geological Map
- **Figure 4** – Topographic Map
- **Figure 5** – Zoning Map
- **Figure 6** – Facility Layout
- **Figure 7** – Site Plan
- **Figure 8** – Wind Rose
- **Figure 9** – Photographs of the Facility

Seismic Compliance

Because Bernalillo County is listed in Appendix VI of the New Mexico Hazardous Waste management Regulations 20.4.1.500 NMAC, incorporating 40 CFR §264.18(a), Rinchem must demonstrate compliance with the seismic standard found in the New Mexico Hazardous Waste Management Regulations 20.4.1 NMAC.

No faults having had displacement in Holocene time are present within 3,000 feet of the Facility. Figure 3 (see in Appendix A) is a color copy of the Section of a published geological map of Albuquerque and Bernalillo County entitled, "Geology of Albuquerque Basin" by Vincent C. Kelly, 1977. It shows the different stratigraphic units found in the Albuquerque basin. This map also shows the faults that are present in the basin. The Facility is identified on the map. As one can see, there is a fault within 3-4 miles of the Facility. This coincides with the type of geology found under the facility. The facility is located over alluvial deposits.

Floodplain Standards

Using a Flood Insurance Rate Map of the city of Albuquerque (Figure 2 in Appendix A), one can see that the facility is not located in an area subject to a 100-year flood. The facility is identified on the map and one can see that the lot which encompasses the Facility touches the boundary for the 100-year flood plain but is not part of it. The nearest flood plain is an area of 100-year shallow flooding where depths are from one to three feet. Prior to construction, the land on which the building is located was elevated

five feet above the surrounding land to alleviate any problems that could be caused by a flood. Even if a 100-year flood occurred, the building would be high enough above the nearby flood plain to prevent damage or water contamination. In this way, the possible hazard caused by bordering a 100-year flood plain is eliminated.

TRAINING PROGRAM [40 CFR 270.14 (b)(12)]

The primary objective of Rinchem Company Inc.'s (**Rinchem**) training program is to instruct employees in the practices, procedures and rules regarding safe operation and maintenance of the Container Storage Facility (**the Facility**) in accordance with applicable State and Federal regulations. The training program requires at least 24 hours training in safety, proper transport and response to hazardous waste emergencies. These classes are often conducted by Rinchem's training department, governmental agencies such as the EPA or DOE and/or outside training providers. The instruction is in the form of classroom instruction and on-the-job training. The training classes and program shall be updated as necessary to meet the regulatory requirements of New Mexico Hazardous Waste Management Regulations 20.4.1.500 NMAC, incorporating 40 CFR §264.16.

All new employees who manage hazardous waste shall complete the initial training courses within six months from their date of hire or from the date of transfer of job assignment. Personnel shall not work unsupervised in their positions until they have completed 24 hours of training. Annually, all personnel must participate in a minimum of eight hours of refresher/review of the initial training.

Rinchem will maintain records of job titles, names of employees, job descriptions and types and amounts of training given to each employee. This information is all tracked in a computer database. Training records on current personnel will be kept until the closure of the facility.

Courses which shall satisfy all or part of the training shall include, but not limited to:

- Initial Facility Orientation -
- OSHA 40-hr Emergency Response Technician - Initial
- OSHA Annual 8-hr Refresher
- DOT Hazardous Materials Transportation Training

The following four Sections are some of the course contents that shall be covered during personnel training.

I. Initial Facility Orientation Course Contents

A. The key elements of the program shall include:

1. Discussion of Emergency Preparedness Plan for the Facility
2. Hazard Identification and Discussion
3. Storage and Segregation
4. Contingency Plan and Emergency Procedures

5. Facility Tour
6. Identify Safety Procedures
7. Identify Communications and Alarm Systems
8. Discuss Evacuation Routes
9. Standard Operation Procedures
10. Review of Procedures to Perform Operations at Facility
11. Safety Practices

The training will consist of lectures, discussion, videos, exercises, examinations and on-the-job training.

II Example of OSHA's 40-Hour Emergency Response Technician Course Contents as required by 29 CFR 1910.120(q)

- A. The key elements of the program include:
1. Emergency Response to Hazardous Materials Incidents,
 2. Characteristics of Hazardous Wastes/Materials,
 3. Information Resources,
 4. Identification of Hazardous Waste,
 5. Levels of Protection,
 6. Chemical Protective Clothing,
 7. Response Operations: Safety Plans and Standard Operating Procedures,
 8. Response Operations: Size-up,
 9. Response Operations: Strategy and Tactics,
 10. Site Entry,
 11. Incident Control: Confinement and Containment,
 12. Direct-Reading Instruments
 13. Response Organization/Incident Command,
 14. Level A Demonstration,
 15. Decontamination,
 16. Establish Incident Command for Transportation Incident,
 17. Organize for Transportation Incident

The training will consist of lectures, discussion, videos, exercises, examinations and on-the-job training.

III Example of OSHA 8-Hour Refresher Course Contents as per 29 CFR 1910.120

- A. The key elements of the OSHA 8-hour Refresher training course contents program shall include:
1. Hazardous Waste Management and Regulations,
 2. Source of Information,
 3. Compatibility of Hazardous Wastes,
 4. Personal Protection,
 5. Principles of Safety, and
 6. Emergency Procedures.

The training will consist of lectures, discussion, videos, exercises, examinations and on-the-job training.

IV Example of DOT Hazardous Materials Transportation Training Course Contents Covered as required under 49 CFR 172.700

- A. The key elements of the program include:
1. General Awareness/Familiarization,
 2. Identification of Hazardous Materials,
 3. Packaging,
 4. Marking,
 5. Labeling,
 6. Shipping Papers,
 7. Placarding,
 8. Separation and Segregation,
 9. Unique Moves,
 10. Safety and Security,
 11. Hazardous Waste Transportation Issues

The training will consist of lectures, discussion, videos, exercises, examinations and on-the-job training.

CLOSURE PLAN: [40 CFR 270.14 (b)(13)]

Rinchem Company Inc. (**Rinchem**) Container Storage Facility (**the Facility**) shall continue to be operated as long as it is deemed economically viable, therefore, currently there is no expected date of closure. However, when the Facility is closed, there shall be no partial closures only a final closure.

Hazardous Waste Inventory

Rinchem shall not manage and/or store more than 55,000 gallons of hazardous waste on-site at any one time. The waste may be managed and stored for up to a year until economic quantity loads can be transported. Some of the wastes shall be bulked and transported in tankers. At the beginning of closure, or before, the waste shall be removed and transported to disposal facilities using the same procedures and practices that are employed in Rinchem's day-to-day business. An exemplary sampling plan listing the areas and procedures to be used for testing the Facility during closure activities is included in this Permit Application.

Closure Performance Standards

Once all of the wastes are removed from the building, a soil gas survey or the latest proven technology being used at the time to detect organic substance shall be used. The survey shall be performed in storage areas B, 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 hazardous waste.

In the rooms where corrosive wastes and products have been stored, concrete coring shall be done at several places in each storage area. A pH test shall be conducted on each concrete sample and the soil beneath it, to determine if further investigation is warranted. The pH shall be obtained by adding deionized water to the sample and the result shall be taken from the liquid. If a more current method of detecting corrosives is available at the time of closure, that method shall be used instead of the one described in the current paragraph.

Random sampling of soil for background levels in the surrounding area shall be conducted during the closure process in order to determine the action levels for pH. Sample procedures shall comply with the U.S. EPA's SW-846: Test Methods for Evaluating Solid Waste – Physical and Chemical Methods. If the pH levels from the Facility are out of the background screening action range, further investigation shall be conducted. All survey samples shall be sent to Hall Environmental Company for analysis, or another

qualified contract laboratory with proper quality assurance/quality control (QA/QC) procedures in place available at time of Closure of the Facility.

Because of its operational history and Rinchem’s policy that requires all leaks and spills to be cleaned up at the time of the incident, it is expected that very little, if any, cleanup shall have to be done at final closure. However, in case the analysis of the samples described above reveals any areas of contamination, both the concrete and soil shall be excavated in the area of concern, analyzed and disposed of in an appropriate manner.

When Rinchem decides to close the Facility, notices shall be sent to generators employing Rinchem’s services to inform them of the pending discontinuation of receiving their waste and materials. NMED shall be informed at least 60 days prior to the date that final closure is expected to begin. All hazardous wastes shall be removed from the site within 90 days of receipt of the final volume of waste and the closure activities shall be completed within 180 days.

Closure Schedule

The following schedule is proposed for final closure of the CSF after receiving the final volume of hazardous wastes:

| <u>Activity</u> | <u>Dates Performed</u> |
|--|------------------------|
| • Removal of all remaining wastes to a treatment, storage, and disposal facility..... | Days 0-90 |
| • Soil gas survey, concrete coring, sampling and analysis performed..... | Days 90-120 |
| • Contingency for excavating, sampling, analyzing and removal of contaminated soil and concrete from site..... | Days 120-170 |
| • Site closure complete..... | Day 180 |

Certification of Closure

A certification that the Facility has been closed shall be sent by register mail or hand delivered to NMED within 60 days of the completion of final closure activities. The certification shall be signed by the owner of Rinchem and a professional engineer registered in the State of New Mexico.

Survey Plat

Rinchem shall provide a survey plat of the Facility to all local zoning authorities acknowledging closure of the Facility.

Closure Plan Amendments

If an amendment needs to be made to the current Closure Plan, Rinchem shall submit a written notification or request to NMED for a permit modification. It should therefore be noted that the Sampling Plan presented below is only an example, because as operations within the Facility and testing

procedures and requirements change, so shall Rinchem's sampling plan through Permit Modification, to reflect these changes.

SAMPLING PLAN

The following is Rinchem's Sampling and Analysis Plan that shall be implemented during closure of the Facility. All sampling procedures shall follow EPA and NMED protocols incorporating SW-846 methods to ensure proper handling of samples including proper **QA/QC** procedures.

Rinchem will hire a third party environmental sampling company to obtain all the required samples needed to satisfy NMED for closure of the facility. The third party company will ensure that the proper safety equipment, sampling equipment, and the proper protocol will be used. This protocol will include the required containers, volumes, preservation methods, holding time, number of samples to collect, and the sampling points.

Sampling Objectives:

1. One of the objectives of soil sampling at closure shall be to identify "hot spots" in the warehouse that comprises rooms A (currently being used as office area), E, and F. These three areas are used to store corrosive material and non regulated hazardous materials/products.
2. Another sampling objective shall be to survey for organics and halogenated organics in warehouse rooms B, C, and D along with the dock areas.

Background Information on the Rooms Comprising the Facility:

- Warehouse area A is currently being used as an office area, but has the engineering to become a chemical storage area if necessary.
- Warehouse Storage Areas E, and F are used to store Corrosive, Toxic, Oxidizer and non-regulated materials, however there will be no storage of RCRA ignitable or reactive waste within 50 feet of the property line.
- Warehouse rooms C, and D are primarily used to store flammable and non-regulated materials.
- Room C is primarily used to store industrial roofing Part A and B Foam Product, but can be used for storage of other materials if necessary, however there will be no storage of RCRA ignitable or reactive waste within 50 feet of the property line.
- Room B has heating and cooling in the room and used to store flammable, corrosives, and non-regulated materials with proper DOT segregation.

Building Structure:

Rinchem shall wipe down all walls, doors, pipe works and all other structures to remove dust that might have collected during storage of hazardous wastes and materials at the Facility. Decontamination equipment (sponges, rags, brushes, etc.) shall be placed into DOT/UN approved containers for hazardous materials. Individual discrete samples shall be taken from the containers for analysis. The soil samples shall be analyzed for the following parameters:

- Total Metals using EPA Methods 1311, 200 and 6010;
- Volatiles, by EPA Method 624, 8260B
- Semi-Volatile for Acid Extractables, using EPA Method 625 and Base Neutral Organics, by EPA Method 8270;
- PCBs, using EPA Method 8082.

If the analytical data reveals that the decontamination equipment possesses contamination above RCRA regulatory limits, the decontamination equipment shall be disposed of at an appropriate /permitted treatment, storage, and disposal facility (TSDF). If the waste is non-RCRA regulated solid waste, it shall be disposed of appropriately/at a local landfill.

Concrete Floors:

Any concrete stains that appear to indicate surface contamination shall be removed utilizing the best available technology at the time (bioremediation, scraping, or washing the floor). If the contamination cannot be removed, the concrete shall be analyzed for the following constituents:

- Total metals, using EPA methods 1311, 200 series and 6010;
- Volatiles, by EPA Method 624, 8260B:
- Semi-Volatile for Acid Extractables, by EPA Method 625 and Base Neutral Organics EPA Method 8270;
- PCBs, using EPA Method 8082
- pH using EPA Method 150.1 and 9045.

If analytical results reveal that portions of the concrete are contaminated, the concrete shall be removed utilizing the best available technology at the time. The concrete shall be disposed of at an appropriate TSDF. The amount of concrete to be removed shall be determined by the grid sampling performed. If the sample in a certain grid is found to be contaminated, all the concrete in that grid shall be removed.

Soils under the Concrete Floor:

Soils that are determined to be contaminated with hazardous waste shall be removed by the best available technology. The amount of soil to be removed shall be determined utilizing on-site field instruments, such as a photo-ionization detector (PID), Hnu and field screening for metals. A "hit, utilizing a PID, shall be any amount in excess of 15 % of background levels. If no background levels are detectable, then levels shall be considered a "hit" when the levels, (after conversion for the PID), equal the lowest of the suspected contaminants' levels from the EPA's Clean Air Act Standards. Confirmation samples shall be taken from each excavated area and be sent to a contract laboratory for analysis. The samples shall be analyzed for the following parameters:

- Total Metals, using EPA Methods 1311, 200 series and 6000 series;
- Volatiles, by EPA Method 624, 8260B;
- Semi-Volatile for Acid Extractables, by EPA Method 625 and Base Neutral Organics by EPA Methods 8270;
- PCBs, EPA Method 8082;
- pH, by EPA Method 150.1 and 9045.

Soils that are determined to be contaminated shall be removed and disposed of at an appropriate TSDF or remediated utilizing the best available on-site technology such as bioremediation, soil-washing or soil burning.

Surrounding Soils:

During closure, Rinchem shall hire a third party sampling company to perform a gas survey on the remaining portions of the Facility. The area within the fence line shall be divided into grids. The gas survey shall show any volatile and semi-volatile contamination. Rinchem shall have the third party sampling company retrieve several composite samples to perform analytical data for 1) Total Metals, EPA Methods 1311, 200 series and 6000 series, 2) Volatiles, EPA Method 624, 8260 B 3) Semi-Volatile for Acid Extractables, EPA Method 625, Base Neutral Organics, EPA Methods 8270, 4) PCBs, EPA Methods 8082, and 5) pH, EPA Methods 150.1 and 9045.

Ground Water Monitoring:

The existing monitoring well at Rinchem has been dry for many years and is no longer sampled. If the direction of ground water has changed then Rinchem shall install a down gradient ground water monitoring well. The information pertaining to the change of groundwater flow shall be obtained from the United States Geological Survey data. Using the down gradient well and the gas survey results shall help establish if ground water contamination has occurred. Rinchem's calculation of groundwater flow at time of closure shall be performed using the current/time water flow from the United States Geological Survey data.

Run-on and Run-off:

Rinchem property is designed to allow no run-on from nearby streets or property. Run-off is limited, because the property is sloped so that rain water remains on the property. All the water that enters the property shall be collected into containment areas. The two containment areas shall be sampled and a full TCLP analysis shall be performed to determine if contamination has occurred.

Analytical Data/Results:

Rinchem shall submit the results of all analyses performed under this sample Closure Plan to NMED for evaluation and final determination on the closure of the Facility.

CLOSURE COST ESTIMATE: [40 CFR 270.14 (b)(15)]

The following Table (**Schedule A**) is Rinchem’s copy of the most recent closure cost estimate for the Facility and a copy of the trust agreement which demonstrates financial assurance. The cost estimate is based on hiring a third party to close the Facility at a point in the Facility’s active life when the extent and manner of its operation would make closure most expensive.

SCHEDULE A

| | |
|----------------------------|--|
| EPA Identification Number: | NMD002208627 *(current) |
| Facility Name: | Rinchem Company, Inc. |
| Address: | 6137 Edith Blvd, NE Albuquerque, NM 87107 |

***Please note that new EPA ID will be assigned with Permit Renewal Approval. Form 8700-12 will be submitted to request new EPA ID # associated with new address of 6137 Edith Blvd. NMED will link both EPA ID#s to the same TSDF.**

SUMMARY OF CLOSURE COSTS

| | |
|---|---------------------|
| Transport of 500 drums to TSD Facility | \$159,472.18 |
| Soil Gas Survey | \$17,020.34 |
| Concrete coring and sampling in corrosive room | \$4,446.22 |
| Contingency for excavating, sampling and disposal of soil | \$37,217.43 |
| Certification of complete closure by Professional Engineer Registered in the State of New Mexico | \$8,466.22 |
| Closure Report to NMED | \$8,466.22 |
| Total Estimated Closure Cost (in 2010 dollars) | \$235,088.61 |

POST-CLOSURE CARE PLAN

Based upon Rinchem's procedures, continuous monitoring policies that are in place, including the fact that any spills or leaks be cleaned up at the time of the incident, there shall be a very minimal post-closure care period. Upon completion of closure activities at the Facility, Rinchem shall present a certification of Closure to the Secretary, NMED. After complete closure of the Facility, subsequent use of the property shall be for non hazardous waste warehouse operations.

However, if Rinchem cannot achieve clean closure it shall submit to NMED a Post-Closure care Plan within 90 calendar days from the date the owner/operator or the secretary determines that the Facility must be closed as a landfill, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.118 through §264.120.

TRUST AGREEMENT & CORRESPONDING DOCUMENTS:

TRUST AGREEMENT

Trust Agreement, the "Agreement," entered into as of 20 June 1995 by and between Rinchem Company Inc., a New Mexico corporation, the "Grantor," and Stanford Call, Certified Public Accountant, licensed in the State of New Mexico, the "Trustee."

Whereas, the United States Environmental Protection Agency, "EPA," an agency of the United States Government, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility shall provide assurance that funds will be available when needed for closure and/or post-closure care of the facility,

Whereas, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein,

Whereas, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as trustee,

Now, Therefore, the Grantor and the Trustee agree as follows:

"Section 1. Definitions." As used in this Agreement:

- (a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.
- (b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.

"Section 2. Identification of Facilities and Cost Estimates." This Agreement pertains to the facilities and cost estimates identified on attached Schedule A.

"Section 3. Establishment of Fund." The Grantor and the Trustee hereby establish a trust fund, the "Fund," for the benefit of EPA. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be

held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by EPA.

"Section 4. Payment for Closure and Post-Closure Care." The Trustee shall make payments from the Fund as the EPA Regional Administrator shall direct, in writing, to provide for the payment of the costs of closure and/or post-closure care of the facilities covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the EPA Regional Administrator from the Fund for closure and post-closure expenditures in such amounts as the EPA Regional Administrator shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the EPA Regional Administrator specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

"Section 5. Payments Comprising the Fund." Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

"Section 6. Trustee Management." The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; "except that:

- (i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company act of 1940, as amended, 15 U.S.C. 80 a-2.(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State government;
- (ii) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State government; and

- (iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

"Section 7. Commingling and Investment." The Trustee is expressly authorized in its discretion:

- (a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and
- (b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80 a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

"Section 8. Express Powers of Trustee." Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

- (a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- (b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;
- (c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or

instrumentality thereof, with a Federal Reserve Bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

- (d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and
- (e) To compromise or otherwise adjust all claims in favor of or against the Fund.

"Section 9. Taxes and Expenses." All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

"Section 10. Annual Valuation." The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the appropriate EPA Regional Administrator a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the EPA Regional Administrator shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

"Section 11. Advice of Counsel." The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

"Section 12. Trustee Compensation." The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

"Section 13. Successor Trustee." The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor Trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the EPA Regional Administrator, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

"Section 14. Instructions to the Trustee." All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the EPA Regional Administrator to the Trustee shall be in writing, signed by the EPA Regional Administrators of the Regions in which the facilities are located, or their designees, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or EPA hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or EPA, except as provided for herein.

"Section 15. Notice of Nonpayment." The Trustee shall notify the Grantor and the appropriate EPA Regional Administrator, by certified mail within 10 days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed, the Trustee shall not be required to send a notice of nonpayment.

"Section 16. Amendment of Agreement." This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the appropriate

EPA Regional Administrator, or by the Trustee and the appropriate EPA Regional Administrator if the Grantor ceases to exist.

"Section 17. Irrevocability and Termination." Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the EPA Regional Administrator, or by the Trustee and the EPA Regional Administrator, if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

"Section 18. Immunity and Indemnification." The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the EPA Regional Administrator issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

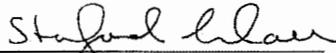
"Section 19. Choice of Law." This Agreement shall be administered, construed, and enforced according to the laws of the State of New Mexico.

"Section 20. Interpretation." As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

In Witness Whereof the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals of be hereunto affixed and attested as of the date first above written: The parties below certify that the wording of this Agreement is identical to the wording specified in 40 CFR 264.151 (a) (1) as such regulations were constituted on the date first above written.



William W. Moore
President
Rinchem Company, Inc.



Stanford Call
Certified Public Accountant

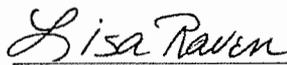
State of New Mexico

County of Bernalillo

On this 20th day of June 1995, before me personally came William W. Moore to me known, who, being by me duly sworn, did depose and say that he resides at 4752 Oahu NE, Albuquerque, New Mexico 87111, that he is President of Rinchem Company Inc. the corporation described in and which executed the above instrument; that he knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that he signed his name thereto by like order.


William W. Moore

SWORN AND SUBSCRIBED before me this 20th day of June 1995 by William W. Moore.


Notary Public

My Commission Expires September 27, 1995

Schedule B

This trust fund is established initially in the following manner:

Rinchem Check # 11940, dated 28 July 1988,
in the amount of \$53,000.00 issued to Peter Everett IV
Attorney at Law, Trustee



COMPANY, INC.

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

February 6, 2001

Cameron Berg
Private Client Services
Wells Fargo Bank
PO Box 1968
Albuquerque, NM 87103

Dear Cameron,

In accordance with our discussions pertaining to the Closure Trust, Rinchem agrees to the following stipulations:

Rinchem Company Inc. ("Rinchem") is the Grantor of a Trust Agreement entered into as of 20 June 1995 ("the Trust") by and between Rinchem and Stanford Call, the Trustee.

Rinchem appoints Wells Fargo Bank New Mexico, N.A. ("Wells Fargo") as successor Trustee pursuant to Section 13 of the Trust.

Rinchem instructs Wells Fargo as Trustee to maintain the current investment of the Trust Fund in The Growth Fund of America – Class A. This instruction is the only investment policy and guideline pursuant to Section 6 of the Trust, effective until further notice.

Rinchem agrees to indemnify and hold Wells Fargo harmless for and against any loss, liability, cost, damages, or expenses (including reasonable attorney's fees) resulting from Wells Fargo as Trustee maintaining the investment in the Growth Fund of America.

Rinchem also agrees to indemnify and hold Wells Fargo harmless for and against any loss, liability, cost, damages, or expenses (including reasonable attorney's fees) resulting from the acts or omissions of Stanford Call as Trustee or any predecessor trustees.

Thank you very much for your help in setting up this document.

We Care,

A handwritten signature in black ink, appearing to read "Jeffrey A. Kubisak".

Jeffrey A. Kubisak
Vice President & Director of Field Services

PERMIT ATTACHMENT M

Page 14 of 18

WE DO IT WELL



Documentation Verification
Assessment 1995
File 77-1102013

BECAUSE WE CARE



Post Office Box 1968
Albuquerque, NM 87103-1968
505 765-5110
505 766-7161 Fax

Private Client Services
Wells Fargo Bank New Mexico, N.A.

February 7, 2001

Jeffrey A. Kubisak
Vice President and Director of Field Sales
Rinchem Company, Inc.
6133 Edith Blvd. NE
Albuquerque, NM 87107

Via Facsimile also to 344-7986

Dear Jeff:

Thank you for your letter of February 6. Wells Fargo is pleased to accept Rinchem Company, Inc.'s appointment as successor Trustee

Please ask Mr. Call to sign and date the enclosed letter and return it in the self-addressed envelope provided. Upon receipt we will take the steps to transfer the units of the Growth Fund of America – Class A.

Sincerely,

A handwritten signature in cursive script that reads "Cameron Berg".

Cameron Berg
Vice President and Trust Officer

Post Office Box 1968
Albuquerque, NM 87103-1968
505 765-5110
505 766-7161 Fax

Private Client Services
Wells Fargo Bank New Mexico, N.A.



February 20, 2001

Mr. Gregg A Cooke
Region 6 Administrator
United States Environmental Protection Agency
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

Via Certified Mail

Re: Rinchem Company, Inc. United States Environmental Protection Agency Trust
Agreement Dated June 20, 1995

Dear Mr. Cooke:

Pursuant to Section 13 of the above referenced Trust Agreement, please be advised that effective March 6, 2001, Wells Fargo Bank New Mexico, N.A. will assume administration as Successor Trustee.

Please let me know if additional information would be helpful. My telephone numbers are 800-246-4066 or 505-766-6377.

Sincerely,

Cameron Berg
Vice President and Trust Officer

Cc: Mr. Jeffrey A. Kubisak
Vice President and Director of Field Sales
Rinchem Company, Inc.
6133 Edith Blvd. NE
Albuquerque, NM 87107

Mr. Cornelius Aminbyas
New Mexico Environment Department
2044 Gallisteo Street
Santa Fe, NM 87505

PERMIT ATTACHMENT M
Page 12 of 18



COMPANY, INC.

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

June 30, 2004

Donald Fennema
Assistant Vice President
Bank of Albuquerque
Corporate Trust

Dear Mr. Fennema,

Please use this letter as the official notice that Rinchem Company, Inc. is directing Bank of Albuquerque to administer our EPA Trust account. It is currently held by Wells Fargo Bank.

The Company hereby agrees to protect, indemnify, defend and hold Bank of Albuquerque, N.A. as Successor Trustee, its officers, directors, employees, agents and attorneys, harmless from any and all liability, cost, expense, damage or loss of whatever nature (including, but not limited to attorneys' fees, litigation and court costs, amounts paid in settlement and amounts paid to discharge judgments) directly or indirectly resulting from, arising out of, in connection with or related to any of the documents executed in connection therewith resulting from acts of omission or acts of negligence by any previous trustees.

Thank you for your time in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Lisa V. Gorgone".

Lisa V. Gorgone
Vice President
Rinchem Company, Inc.

WE DO IT WELL



BECAUSE WE CARE



July 6, 2004

Linda L. Browning
Wells Fargo, N.A.
Trust Department
P.O. Box 1968
Albuquerque, NM 87103

By certified mail

Dear Ms. Browning:

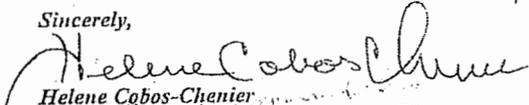
We have been asked to become successor trustee to Wells Fargo, N.A. on the Rinchem Company, Inc. EPA Trust, Account Number 10647100. A copy of Rinchem's letter, dated June 30, 2004, appointing Bank of Albuquerque as successor trustee is enclosed. In accordance with Section 13 of the Trust Agreement between Wells Fargo and Rinchem Company, Inc., we have accepted Rinchem's appointment effective July 21, 2004.

Please transfer funds and assets in the above referenced account to the attention of Donald Fennema, phone number (505) 222-8457. The wiring instructions are as follows:

Bank of Oklahoma, N.A.
ABA # 1039-00036
Credit account # 600024642/Trust Funds
Further credit: Rinchem, NM

Please call me at (505) 222-8446 or Donald Fennema at (505) 222-8457 if you have any questions.

Sincerely,


Helene Cabos-Chenier
Vice President
Corporate Trust Services

Cc: Lisa V. Gorgone, Rinchem Company, Inc.
James Bearzi, NM Hazardous Waste Bureau

Enclosure

RINCHEM COMPANY, INC – PART B TSDF
NMD002208627 (CURRENTLY-NEW EPA ID# WILL BE ASSIGNED AT RENEWAL APPROVAL)

INSURANCE COVERAGE: [40 CFR 270.14 (b)(17)]

The following pages contain a copy of Rinchem Company's Insurance Coverage.

**New Mexico Environment Department
Certificate of Insurance
for Hazardous Waste Facility**



1. Steadfast Insurance Company, (the "Insurer"), of 1400 American Lane, Schaumburg Illinois 60196 hereby certifies that it has issued liability insurance covering bodily injury and property damage to , Rinchem Company, Inc (the "insured"), of 6133 Edith Blvd. NE, Albuquerque, NM 87107 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147 as adopted by New Mexico Administrative Code Title 20 Environmental Protection Chapter 4 Hazardous Waste Part 1 Hazardous Waste Management sub-part 500, as applicable. The coverage applies at EPA ID# NMD085267961; Rinchem West: 6133 Edith Blvd. NE, Albuquerque, NM 87107 for "sudden and non sudden accidental occurrences". The limits of liability are \$3,000,000/\$6,000,000 ("each occurrence" and "annual aggregate" limits of the Insurer's liability), exclusive of legal defense costs. The coverage is provided under policy number EPC 9311653-00, issued by 09/01/2011. The effective date of said policy is 08/01/2011.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

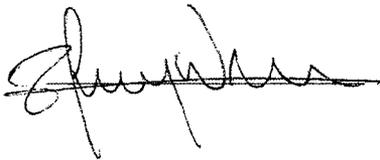
(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by the Secretary of the New Mexico Environmental Department or his/her designee, the Insurer agrees to furnish to such individual a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is(are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the New Mexico Environmental Department or his/her designee in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as adopted by such regulation and the New Mexico Administrative Code Title 20 Environmental Protection Chapter 4 Hazardous Waste Part 1 Hazardous Waste Management sub-part 500, as applicable, was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



Joaquin Neira

Underwriter

Signature of witness or notary:  _____

July 27, 2011



CERTIFICATE OF LIABILITY INSURANCE Page 1 of 1

DATE (MM/DD/YYYY)
06/30/2011

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

| | | | |
|----------|---|--|-----------------------------|
| PRODUCER | Willis of Arizona, Inc. 26 Century Blvd. P. O. Box 305191 Nashville, TN 37230-5191 | CONTACT NAME | |
| | | PHONE (A/C NO. EXT): 877-945-7378 | FAX (A/C NO.): 888-467-2378 |
| | | E-MAIL ADDRESS: certificates@willis.com | |
| INSURED | Rinchem Company, Inc. and Subsidiaries 6133 Edith Blvd. NE Albuquerque, NM 87107 | INSURER(S) AFFORDING COVERAGE | |
| | | INSURER A: Steadfast Insurance Company | NAIC # 26387-005 |
| | | INSURER B: Zurich American Insurance Company | 16535-007 |
| | | INSURER C: | |
| | | INSURER E: | |

COVERAGES CERTIFICATE NUMBER: 16184281 REVISION NUMBER: See Remarks

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.

| INSR TYR | TYPE OF INSURANCE | ADD'L INSR | SUBR WVD | POLICY NUMBER | POLICY EFF (MM/DD/YYYY) | POLICY EXP (MM/DD/YYYY) | LIMITS | |
|-------------|---|---------------|-------------|------------------|-------------------------------|-------------------------------|--|---|
| A | GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR | Y | | GL0943000602 | 10/1/2010 | 10/1/2011 | EACH OCCURRENCE | \$ 1,000,000 |
| | | | | | | | DAMAGE TO RENTED PREMISES (Ea occurrence) | \$ 100,000 |
| | | | | | | | MED EXP (Any one person) | \$ 5,000 |
| | | | | | | | PERSONAL & ADV INJURY | \$ 1,000,000 |
| | | | | | | | GENERAL AGGREGATE | \$ 2,000,000 |
| | | | | | | | PRODUCTS - COMP/OP AGG | \$ 2,000,000 |
| | | | | | | | | \$ |
| B | AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS | Y | | TRX943000402 | 10/1/2010 | 10/1/2011 | COMBINED SINGLE LIMIT (Ea accident) | \$ 1,000,000 |
| | | | | | | | BODILY INJURY (Per person) | \$ |
| | | | | | | | BODILY INJURY (Per accident) | \$ |
| | | | | | | | PROPERTY DAMAGE (Per accident) | \$ |
| | | | | | | | | \$ |
| A | UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION S | Y | | SE0596770602 | 10/1/2010 | 10/1/2011 | EACH OCCURRENCE | \$ 4,000,000 |
| | | | | | | | AGGREGATE | \$ 4,000,000 |
| | | | | | | | | \$ |
| B | WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? <input type="checkbox"/> (Mandatory in NJ) (If yes, describe later) DESCRIPTION OF OPERATIONS below | Y/N | N/A | WC943000503 | 10/1/2010 | 10/1/2011 | <input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER | |
| | | | | | | | E.L. EACH ACCIDENT | \$ 1,000,000 |
| | | | | | | | E.L. DISEASE - EA EMPLOYEE | \$ 1,000,000 |
| | | | | | | | E.L. DISEASE - POLICY LIMIT | \$ 1,000,000 |
| A | Pollution Legal Liability | Y | | EPC596700402 | 10/1/2010 | 10/1/2011 | | \$3,000,000 Each Loss \$6,000,000 All Losses |

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach Acord 101, Additional Remarks Schedule, if more space is required)
 THIS VOIDS AND REPLACES PREVIOUSLY ISSUED CERTIFICATE DATED: 9/30/2010 WITH ID: 14809945

It is agreed that City of Albuquerque is included as an Additional Insured as their interest may appear on all policies except Workers Compensation coverage, if required by written contract.

| | |
|--------------------|--|
| CERTIFICATE HOLDER | CANCELLATION |
| | SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. |
| | AUTHORIZED REPRESENTATIVE |

TOPOGRAPHIC MAP: [40 CFR 270.14 (b)(19)]

Figure 2, 4, 8 (see Appendix A) is used to meet the requirements of this section. The wind rose data for Bernalillo in 2010 is attached below which, according to the Albuquerque Environmental Health Department's monitoring section of the Air Pollution Control Division, has a wind rose pattern similar to the pattern in the area where the facility is located. Figure 4 is a topographic map with contours in two-foot intervals which show a distance of 1000 feet around the facility. It is a combination of three maps from the City of Albuquerque Public Works Department and the Flood Insurance Rate Map of the city of Albuquerque (see Figure 2). The 100-year floodplain areas were enlarged to the same scale as the topographic maps and copied onto them. These figures fulfill the following requirements:

- Map scale and date
- 100-year floodplain
- Surface waters including intermittent streams
- A wind rose
- Surrounding land uses
- Orientation of the map
- Legal boundaries of the hazardous waste management facility site
- Access control
- The building
- Barriers for drainage or flood control
- Location of unit within the hazardous waste management facility site where hazardous waste is stored.

Since Topographic Map No. 4 (see Appendix A) which is the latest available map, was compiled before the facility was built, it did not take into account the fact that the land under the building was elevated five feet. Therefore, the revised elevation of 4983 feet is handwritten on map. No injection wells or withdrawal wells are shown because no wells are known to be in use within 1000 feet of the facility site. Several wells had been abandoned because of the lowering of the water table and availability of city water. This information was obtained from the Well Record in the State Engineer's Office. This was also confirmed by a survey of the residential area in the 1000 feet radius of the facility site. The only building that is on the property is the Rinchem warehouse and office.

PRE-APPLICATION MEETING[40 CFR 270.14 (b)(22)]:

On June 24, 2011, a pre-application meeting was held between NMED, Rinchem Company, and Advanced Chemical Transport (ACT). This meeting was held to inform NMED that ACT was in the process of purchasing the environmental waste service division from Rinchem, as well as how to proceed with the permit renewal process while the acquisition was taking place.

This meeting was also held to request NMED to consider a change in address for the TSDF from 6133 Edith Blvd. to 6137 Edith Blvd. The Part B TSDF Facility's current physical address is Rinchem's corporate

address, which Rinchem would like to keep when the sale of the TSDF is final with ACT. The Bernalillo County Zoning Depart authorized the change and their approval letter is attached. At the time of this meeting NMED determine they would need to inquire further into regulations that this change could take place.

The attached email between John Kieling of NMED and Polly Wagner of Rinchem describes the steps necessary by all parties involved to address the permit renewal, address change and sale of the Part B TSDF to ACT.

The attendees of that meeting were as follows:

- John Kieling-Acting Chief - NM Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87508
- Cornelius Amindyas-Environmental Specialist - NM Hazardous Waste Bureau
5500 San Antonio Drive, NE
District 1
Albuquerque, NM 87109
- Lise Gorgone-Director of Operations-Rinchem Company, Inc.
6133 Edith Blvd. NE
Albuquerque, NM 87107
- Polly Wagner-TSDF Facility Manager-Rinchem Company, Inc.
6133 Edith Blvd. NE
Albuquerque, NM 87107
- Robert Goff-TSDF Assistant Facility Manager-Rinchem Company, Inc.
6133 Edith Blvd. NE
Albuquerque, NM 87107
- Adam Brandin-Director of Sales-Advanced Chemical Transport
1210 Elko Drive
Sunnyvale, CA 94089
- Krista Harsono-Director of Compliance-Advanced Chemical Transport
2213 Meyers Ave.
Escondido, CA 92029



County of Bernalillo
Zoning, Building & Planning Department
111 Union Square St SE Ste 100
Albuquerque, NM 87102
Office (505)314-0350 Fax (505)314-0480

July 15, 2011

Rinchem
Attn: Lisa Gorgone
6133 Edith Blvd Ne
Albuquerque, NM 87107

Re: **CHANGE OF ADDRESS**

This letter is to serve notice of an address correction for: **Lot 4A-1 of Subdivision of Lot 4A Edith Land Company Cont 1.960 Ac**
Uniform Property Code: **101506131049110643**

FROM:

6133 Edith Blvd NE
Albuquerque NM 87107

TO:

6137 Edith Blvd NE
Albuquerque NM 87107

Address changes occur for the Safety, Health and Welfare of the residents of Bernalillo County. Please update your records to show this change.

If you have any questions, please contact our Permit Specialist, Wendy Barker directly at (505) 314-0362 or wbarker@bernco.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Beaman".

Daniel J. Beaman
Permit & Application Processing Manager



County of Bernalillo
Zoning, Building & Planning Department
111 Union Square St SE Ste 100
Albuquerque, NM 87102
Office (505)314-0350 Fax (505)314-0480

July 15, 2011

Rinchem
Attn: Lisa Gorgone
6133 Edith Blvd Ne
Albuquerque, NM 87107

Re: **CHANGE OF ADDRESS**

This letter is to serve notice of an address correction for: **Lot 3 Land Of Edith Land Co**
The Major Portion Of Tract 2 MRGCD Map 32
Uniform Property Code: **101506132848110644**

FROM:

6137 Edith Blvd NE
Albuquerque NM 87107

TO:

6133 Edith Blvd NE
Albuquerque NM 87107

Address changes occur for the Safety, Health and Welfare of the residents of Bernalillo County. Please update your records to show this change.

If you have any questions, please contact our Permit Specialist, Wendy Barker directly at (505) 314-0362 or wbarker@bernco.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel J. Beaman". The signature is stylized with a large loop at the beginning and a long horizontal stroke at the end.

Daniel J. Beaman
Permit & Application Processing Manager

Polly J. Wagner

From: Kieling, John, NMENV [john.kieling@state.nm.us]
Sent: Thursday, August 04, 2011 9:50 AM
To: Polly J. Wagner; Amindyas, Cornelius, NMENV
Subject: RE: Physical address for Rinchem Part B Permit

Polly,
I made a change to item 1 to make it consistent with our discussion yesterday.
If you have any questions please call me.

1. By August 12, 2011:
 - a. Rinchem is submitting the permit renewal, Parts A and B as Rinchem Company, Inc requesting a new EPA ID# on the 8700-12 Form, found at: <http://www.nmenv.state.nm.us/hwb/notifiers.html> and the new address of 6137 Edith Avenue as a "renewal".
 - b. Rinchem will also submit the disclosure statements with all of Rinchem's information.
 - c. Advanced Chemical Transport will be submitting their disclosure statements with all of ACT's (Transport) information.
2. If the permit renewal has not been approved by NMED by the time the sale is final between Rinchem and ACT, we will complete the following items to change operator ownership of the current permit, which will remain in effect unto the new permit has been approved by NMED:
 - a. We will submit a Class 1 Permit modification to NMED to change the Operator Name from Rinchem to Advanced Chemical Treatment. (new ACT corporation)
 - b. We will submit updated disclosures statements for the new corporation of Advanced Chemical Treatment to NMED.
 - c. Rinchem will notify Advanced Chemical Treatment in writing of the requirements of 20.4.900 NMAC, incorporating 40 CFR Part 270, and of the Permit as part of the requirement of our current permit in Module 1, Section I.E.3, *Transfer of Permit*.
 - d. When NMED approves Class 1 Permit Modification and all the proper notifications have been made, Advanced Chemical Treatment will be the Operator of Record of the current permit, with the current EPA ID# NMD002208627 and the current address of 6133 Edith Blvd.
3. Also, once the sale is final between Rinchem and ACT, ACT will resubmit the permit application Parts A and B as ACT with the new address of 6137 Edith Blvd and the New EPA ID#. Rinchem, NMED, and ACT will all have documentation on file stating the explanation of the address change and how the old EPA ID # NMD002208627 will link the new EPA ID # to the history of the TSDF for tracking purposes.
4. NMED will not recognize the new EPA ID # or the new address until the new permit is approved, but with all the proper notifications to NMED, NMED will recognize Advanced Chemical Transport as the Operator of the current permit when the sale is final.

John E. Kieling
Acting Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87506-6303
john.kieling@state.nm.us

Phone: (505) 476-6035
HWB Main Phone: (505) 476-6000
Fax: (505) 476-6030

From: Polly J. Wagner [mailto:pwagner@Rinchem.com]
Sent: Wednesday, August 03, 2011 7:02 PM
To: Polly J. Wagner; Kieling, John, NMENV; Amindyas, Cornelius, NMENV
Subject: RE: Physical address for Rinchem Part B Permit

Hi John, I have documented a recap of our discussion this morning regarding the Part B Permit. Can you please confirm via email, so that I can share with the ACT and Rinchem Teams?

5. By August 12, 2011:
 - a. Rinchem is submitting the permit renewal, Parts A and B as Rinchem Company, Inc with the current EPA ID # of NMD002208627 and the current address of 6133 Edith Avenue as a "renewal".
 - b. At the same time Rinchem will also submit a notification form requesting a new EPA ID with the new address, adding documentation to explain the change in address and request for new EPA ID #.
 - c. Rinchem will also submit the disclosure statements with all of Rinchem's information.
 - d. Advanced Chemical Transport will be submitting their disclosure statements with all of ACT's (Transport) information.

6. If the permit renewal has not been approved by NMED by the time the sale is final between Rinchem and ACT, we will complete the following items to change operator ownership of the current permit, which will remain in effect until the new permit has been approved by NMED:
 - e. We will submit a Class 1 Permit modification to NMED to change the Operator Name from Rinchem to Advanced Chemical Treatment. (new ACT corporation)
 - f. We will submit updated disclosures statements for the new corporation of Advanced Chemical Treatment to NMED.
 - g. Rinchem will notify Advanced Chemical Treatment in writing of the requirements of 20.4.900 NMAC, incorporating 40 CFR Part 270, and of the Permit as part of the requirement of our current permit in Module 1, Section I.E.3, *Transfer of Permit*.
 - h. When NMED approves Class 1 Permit Modification and all the proper notifications have been made, Advanced Chemical Treatment will be the Operator of Record of the current permit, with the current EPA ID# NMD002208627 and the current address of 6133 Edith Blvd.

7. Also, once the sale is final between Rinchem and ACT, ACT will resubmit the permit application Parts A and B as ACT with the new address of 6137 Edith Blvd and the New EPA ID#. Rinchem, NMED, and ACT will all have documentation on file stating the explanation of the address change and how the old EPA ID # NMD002208627 will link the new EPA ID # to the history of the TSDF for tracking purposes.

8. NMED will not recognize the new EPA ID # or the new address until the new permit is approved, but with all the proper notifications to NMED, NMED will recognize Advanced Chemical Transport as the Operator of the current permit when the sale is final.

Again, John, thank you for all of your help and understanding with our very confusing situation. As I said before, if I have anything wrong, please let me know.

Polly Wagner, CHMM
Facility Manager - ABQ West Warehouse
Phone: 505-998-4143
Cell: 505-681-4921
Fax: 505-998-4343
Email: pwagner@rinchem.com



ADDITIONAL INFORMATION REQUIREMENTS: [40 CFR 270.14 (c)]: This section is not applicable for Rinchem's Part B Permit Renewal Application. The groundwater monitoring wells installed by Rinchem are dry and no further monitoring is required.

SOLID WASTE MANAGEMENT UNIT INFORMATION: [40 CFR 270.14 (d)]

Introduction

For the purposes of this permit, Rinchem Company, Inc., considers the Container Storage Facility (**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 (See *Rainwater & runoff containment areas* on the attached Facility Layout) within the fenced-in boundaries are considered possible solid waste management units (**SWMUs**). The attached Facility Layout shows the location of the various units comprising the Facility. The attached photographs show the storage rooms of the Facility.

The Facility has been in operation since January 1, 1987 and has been used as a Part B Container Storage Facility and transfer station for wastes with the following U.S. Department of Transportation hazardous classes: 1.4, 2.1, 2.2, 2.3, 3.0, 4.1, 4.2, 4.3, 5.1, 5.2, 6.0, 6.2, 8.0 and 9.0.

Description of Permitted Units of the Facility:

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 stem wall 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. Both Rooms A and B can store inorganic or organic chemicals. No releases to report in these areas.

Room A is currently being used as an office area and not as a chemical storage area; however, the engineering required has been maintained and could be converted back to a chemical storage area at anytime if necessary.

Rooms C & D Storage Areas

These active storage units are designed to warehouse chemicals and hazardous wastes for subsequent transfer to off-site facilities. 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 stem wall 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. Both Rooms C and D can store inorganic or organic chemicals. No reportable releases to report.

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 x50 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. Both Rooms E and F can store inorganic or organic chemicals. No releases to report in these areas.

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 was a release reported to NMED on September 13, 2007, with a follow up 7 day report on September 20, 2007; Case #ENTS2316.

Spill Drain System

The Spill Drain System manages any spill which may occur in Rooms B and D. The system consists of concrete construction, a cast-iron gate covering, and a six-inch cast-iron pipe that shall carry any spills to the Spill Collection Tank. The Spill Drain Collection Tank System is active and has been in operation since January 1, 1987.

Spill Collection Tank

Any spills that occur in Rooms B and 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 60 feet long and 30 feet wide. The in-ground 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 shall carry any 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 since operations began at the Facility.

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

ADDITIONAL CONTAINER INFORMATION: [40 CFR 270.15]

All floors in storage areas A, B, C and D are recessed four inches below the concrete stem wall and storage areas E and F are recessed six inches below the stem wall. The concrete is sealed and the expansion joints are caulked to prevent possible contamination of the soil should a spill occur. The capacity of the secondary containment system is at least 10% of the volume of the containers stored there.

In storage areas A, B, C, E and F, the floors are sloped away from the storage bays towards the aisles. Storage Area D is divided into six bays which are each sloped to drains situated in the center of the bay. The drains lead to a 500 gallon cement tank behind the building under the dock. This tank is housed in another concrete watertight tank which has a volume of 3,790 gallons. Both tanks have removable vented lids to allow for visual inspection and removal of any spilled or leaked waste.

Run-on into the containment system is prevented in two ways. Firstly, the storage areas with containment systems are inside the building preventing any rain from entering the storage area. Secondly, the Facility was elevated five feet above the surrounding land when it was constructed. This prevents any flooding into the containment system.

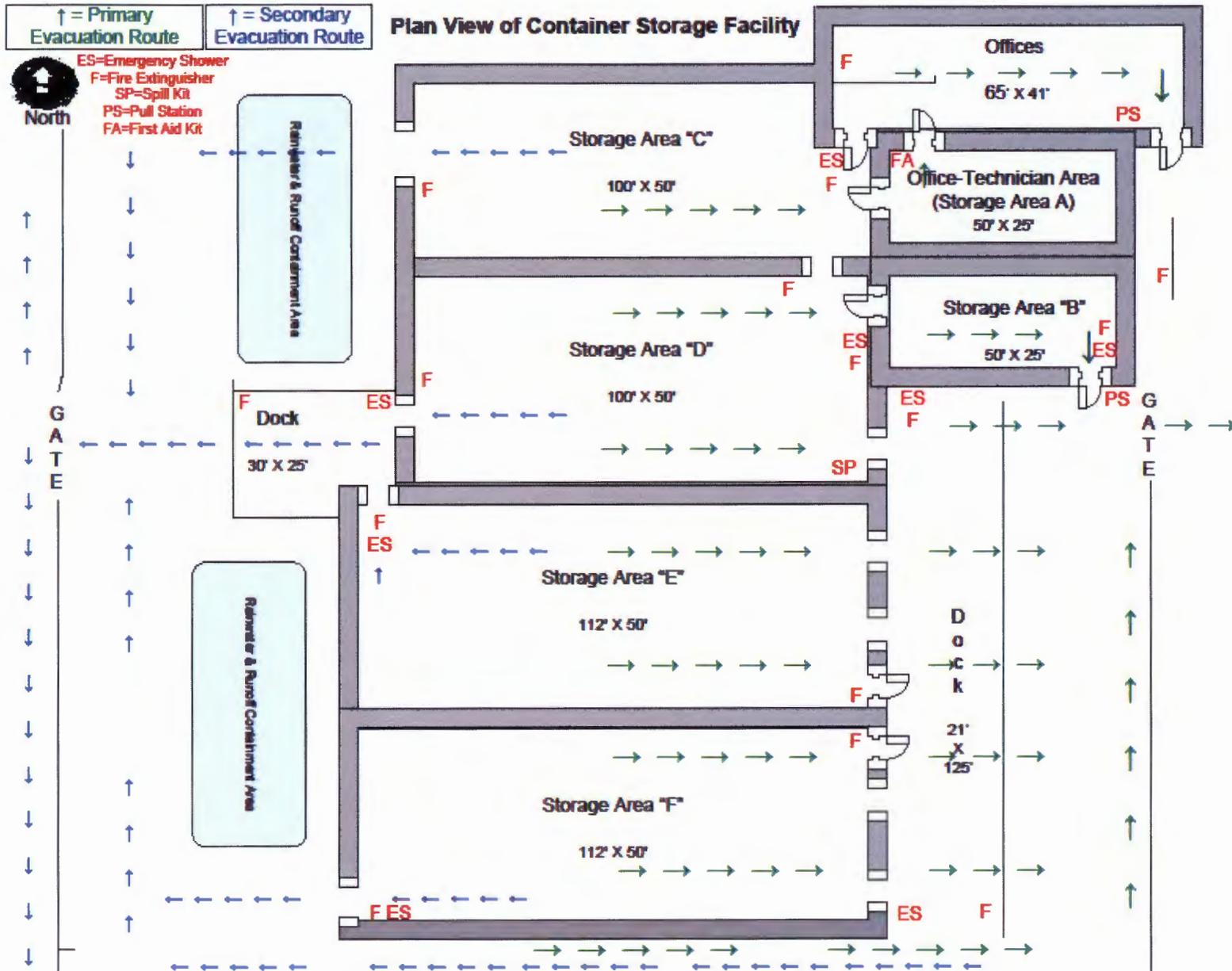
If a spill occurs, Rinchem shall evaluate and clean it up in as timely a manner as possible to prevent further contamination and overflow of the containment system. The fact that the floors in the storage areas are sloped towards the aisles allows a spill or leak to be detected quickly.

Rinchem will store all ignitable and reactive wastes in the appropriate storage areas with proper segregation against incompatible wastes. These storage areas are more than 50 feet away from Rinchem's property line. As it has been previously mentioned, all storage containers holding hazardous waste that is incompatible with other materials shall be separated and protected from these materials by cinderblock walls, stem walls and ramps in between the storage areas as follows:

1. All containers holding hazardous materials to be stored at Rinchem's Facility shall be inspected prior to acceptance to insure proper condition of the container and compatibility of material with container. Any container not meeting these criteria shall have its contents transferred to an appropriate container at that time.
2. A container holding hazardous waste shall not be handled or stored in a manner which may cause it to leak or shall only be opened to add or remove waste as necessary.
3. No incompatible wastes shall ever be placed in the same container unless the proper precautions are taken to prevent reactions which:
 - Generate extreme heat or pressure, fire or explosions, or violent reactions;
 - Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment;
 - Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

- Damage structural integrity of the Facility; and
- Through other like means threaten human health or the environment

Hazardous waste shall not be placed in un-rinsed containers that previously held an incompatible waste or material. Other preventive measures are described in *Preparedness and Prevention section*.





Room A



Room B



Room C



Room D



Room E



Room F

AIR EMISSION CONTROLS FOR CONTAINERS [40 CFR 270.27 (a)(2)(3)]:

A. APPLICABILITY

1. 40 CFR Subpart CC applies to all containers identified in the Facility Operation Permit previously issued by NMED, except as provided for in 20.4.1.500 NMAC, incorporating 40 CFR §264.1 and §264.1080(b).
2. The Conditions of this section apply to the hazardous waste management units identified in **Table 4** below, and described in *General Facility Description*, for which required control equipment has been installed and is operational or are exempt from Subpart CC standards under §264.1082(c).

Table 4 - Hazardous Waste Management Units for Which Subpart CC Emissions Controls are Installed

| Hazardous Waste Management Unit Type Designation/ Identification Number | Hazardous Waste Management Unit Type | Description of Air Emission Control System |
|--|---|---|
| Containers located at Containerized Waste Storage Units A,B,C,D,E and F, where Inorganic and Organic Chemicals are stored, including the Loading/Unloading Docks in front and behind the Storage Building. | <p>Container Type A:</p> <p>These are containers with design capacity greater than 0.1 m³ and less than 0.46 m³ (about 126 gal).</p> | <p>Container Level 1 Controls per §264.1086(c) – equipped with cover and closure devices which form a continuous barrier over container openings. These containers may also be controlled using Level 1 controls using applicable DOT regulations or using Level 1 Controls for open-top containers in which an organic vapor suppressing barrier is placed in on the hazardous waste. Type A containers also have an average volatile organic concentration at the point of origination equal to or greater than 500 ppmw.</p> |
| | <p>Container Type B:</p> <p>These are containers with design capacity greater than 0.46 m³ that are not in light material service.</p> | <p>Container Level 1 Controls per 20.4.1.500 NMAC, incorporating 40 CFR §264.1086(c) – equipped with cover and closure devices which form a continuous barrier over container openings.</p> |
| | <p>Container Type C:</p> <p>Containers with design capacity greater than 0.46 m³ that are in light material service.</p> | <p>Container Level 2 controls per 20.4.1.500 NMAC incorporating 40 CFR §264.1086(c) – demonstrated to be vapor tight using 20.4.1.500 NMAC, incorporating 40 CFR Part 60, Appendix A, Method 27:</p> <p>If the generator or transporter does not provide appropriate documentation to demonstrate compliance via testing for organic vapor tightness, Level 2 controls operated with no detectable emissions as defined in 20.4.1.600 NMAC, incorporating 40 CFR §264.1081 shall be used.</p> |

B. GENERAL STANDARDS

Rinchem shall comply with the applicable requirements of 20.4.1.500 NMAC, incorporating of 40 CFR Part 264, Subpart CC.

C. SUBPART CC STANDARDS FOR CONTAINERS IN TABLE 4

1. Inspection of Level 1 or Types A and B Containers:

- a. Rinchem shall visually inspect all Type A containers for defects at the time Rinchem first manages and stores hazardous waste or hazardous waste or is accepted at the Facility. If a container remains at the Facility for one (1) calendar year or more, it shall be visually inspected for defects at least once every 12 months, in addition to the (daily) frequency of inspection presented in *Inspection Plan*. [20.4.1.500 NMAC, incorporating 40 CFR §264.1086(b)(1)(ii) and (c)(1)(i-iii)].
- b. Rinchem shall visually inspect all Type B containers and cover devices for defects at the time the container is first used for managing and storing hazardous waste or the first time hazardous waste is accepted at the Facility. If a container remains at the Facility for one (1) calendar year or more, it shall be visually inspected for defects at least once every 12 months. [20.4.1.500 NMAC, incorporating 40 CFR §264.1086(b)(1)(ii) and (c)(1) and (c)(1)(i-iii)].

2. Inspection of Level 2 or Type C Containers:

Rinchem shall visually inspect all Type C containers and cover devices for defects at the time the container is first used to manage and store hazardous waste or the first time hazardous waste is accepted at the Facility. If a container remains at the Facility for one (1) calendar year or more, it shall be visually inspected for defects at least once every 12 months. [40 C.F.R. 264.1086(b)(1)(iii)].

D. REPAIR OF LEVELS 1 AND 2 (i.e., TYPES A, B, AND C) CONTAINERS:

1. **Level 1 Containers:** If a defect is detected in a container using Level 1 standards, Rinchem shall repair the defect as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.1086(c)(4)(iii).
2. **Level 2 Containers:** If a defect is detected in a Container which is being managed using Container level 2 standards, Rinchem shall repair the defect as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.1086(d)(4)(iii).

E. REPORTING REQUIREMENTS

1. For each container which manages hazardous waste that is exempted from using air emission controls, a written report shall be submitted to the Secretary within fifteen (15) calendar days of each occurrence when hazardous waste is placed in the waste management unit in noncompliance with the Conditions of 20.4.1.500 NMAC, incorporating 40 CFR §264.1082(c)(1) or (c)(2), as applicable. The written report shall contain the EPA identification number, Facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent reoccurrence of the noncompliance.

2. All reports shall be signed and dated by an authorized representative of Rinchem as per 20.4.1.900 NMAC, incorporating 40 CFR §270.11(b).

F. NOTIFICATION OF NEW UNITS

Prior to installing container or miscellaneous unit subject to 20.4.1.500 NMAC, incorporating 40 CFR Part 264, Subpart CC, or modifying an existing process, waste handling or container such that the unit(s) will become subject to 20.4.1.500 NMAC, incorporating 40 CFR Part 264 Subpart CC, Rinchem shall apply for a Permit modification under 20.4.1.900 NMAC, incorporating 40 CFR §270.42, and provide specific Part B application information required under 20.4.1.900 NMAC, incorporating 40 CFR §270.14-17 and §270.27, as applicable, with the modification request.

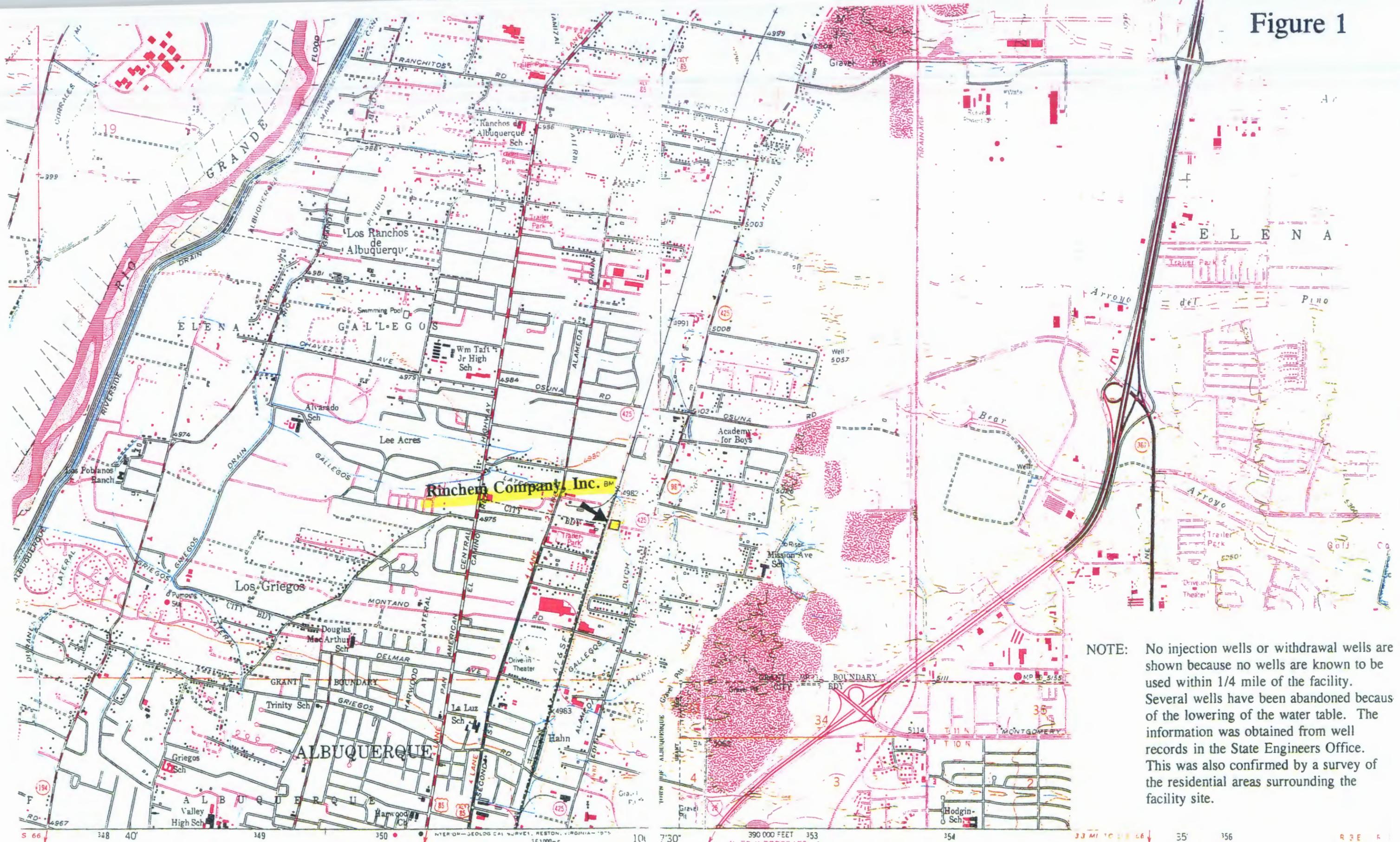
G. COMPLIANCE SCHEDULE

Rinchem shall comply with the requirements of the compliance schedule required by NMED.

[40 CFR 270.29]: Rinchem acknowledges that NMED Hazardous Waste Bureau may deny the permit application either in its entirety or as to the active life of a hazardous waste management facility or unit only.

**Figure 1 – General Location Map of the
Facility**

Figure 1



NOTE: No injection wells or withdrawal wells are shown because no wells are known to be used within 1/4 mile of the facility. Several wells have been abandoned because of the lowering of the water table. The information was obtained from well records in the State Engineers Office. This was also confirmed by a survey of the residential areas surrounding the facility site.

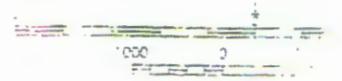
Scale
1:24000



ROAD CLASSIFICATION
 Heavy-duty ——— Light-duty ———
 Medium-duty ——— Unimproved dirt ———

Mapped, edited and published by the Geological Survey
 Control by USGS and USC&GS
 Culture and Shading in part compiled from aerial photographs
 taken 1950 (Thompson), by planetable surveys 1954 Revised 1960

Latitude: 35 08' 39"
 Longitude: 106 37' 43"



**TO VIEW THE MAP AND/OR
MAPS WITH THIS DOCUMENT,
PLEASE CALL THE
HAZARDOUS WASTE BUREAU
AT 505-476-6000 TO MAKE AN
APPOINTMENT**

Figure 3 – Geological Map

FIGURE 1
GEOLOGIC MAP

MEMOIR 33 · GEOLOGIC MAP

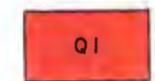
EXPLANATION



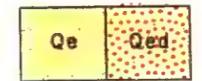
Alluvium
Qa: Arroyos; Qfa: Fans



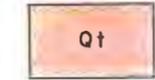
Alluvium
Floodplains



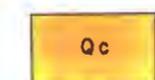
Landslide



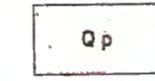
Eolian sand
Qe: Blankets; Qed: Dunes



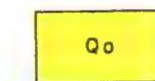
Gravel terraces



Caliche



Gravel pediments



Ortiz pediment gravel and surface
Fanglomerate ranging from large boulders to pebbles



Santa Fe Formation

Ts: Undivided: pinkish, light-olive-drab and white sandstone, gray and brown mudstone; arkose, conglomerate, and fanglomerate. Tsc: Ceja Member, "Upper buff" of Bryan and McCann; grayish sand and pebbly conglomerate. Tsz: Zia

GEOLOGY OF ALBUQUERQUE BASIN

by Vincent C. Kelley, 1977



SCALE 1:190,000

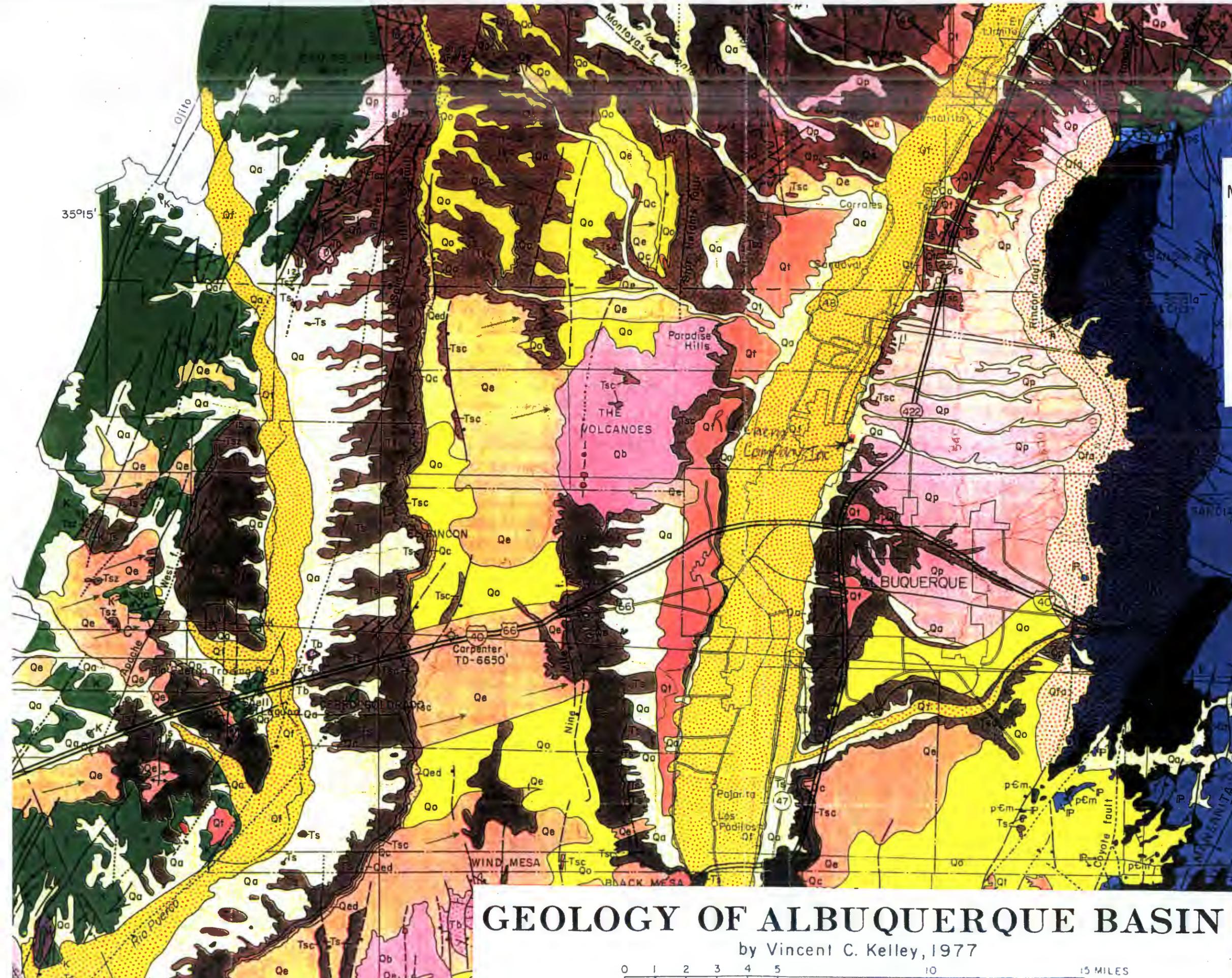


Figure 4 – Topographic Map

Figure 5 – Zoning Map

ZONING MAP

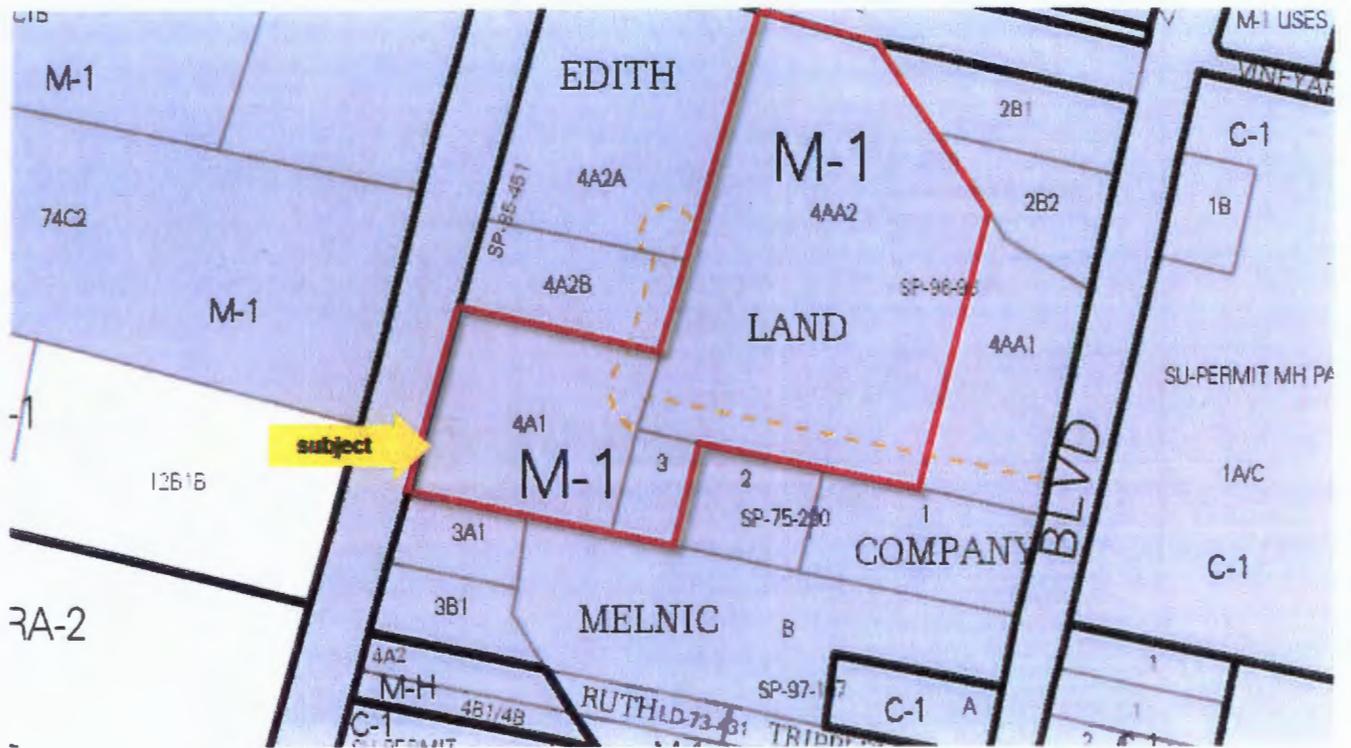


Figure 6 – Facility Layout

↑ = Primary Evacuation Route
 ↑ = Secondary Evacuation Route

ES=Emergency Shower
 F=Fire Extinguisher
 SP=Spill Kit
 PS=Pull Station
 FA=First Aid Kit

Plan View of Container Storage Facility

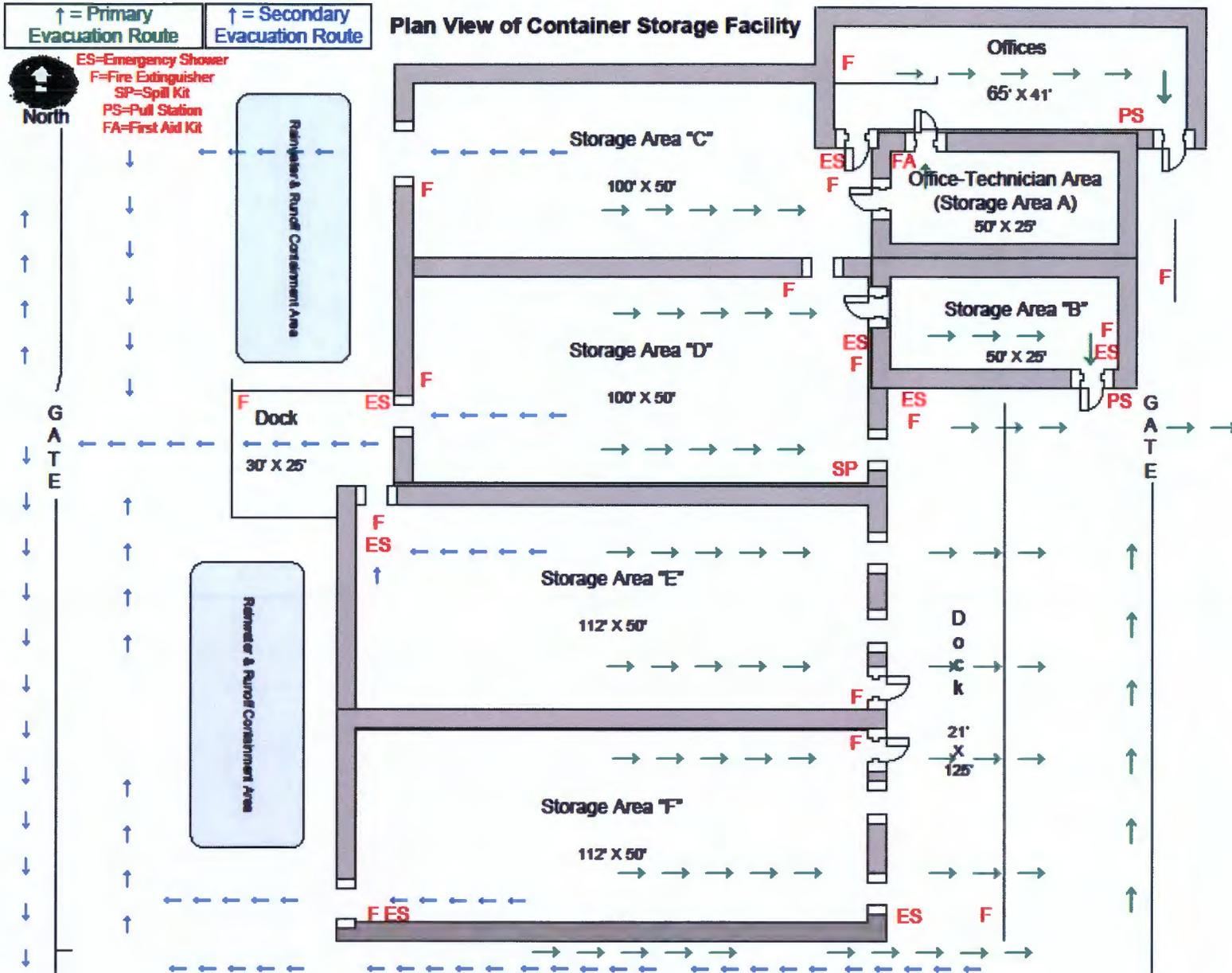
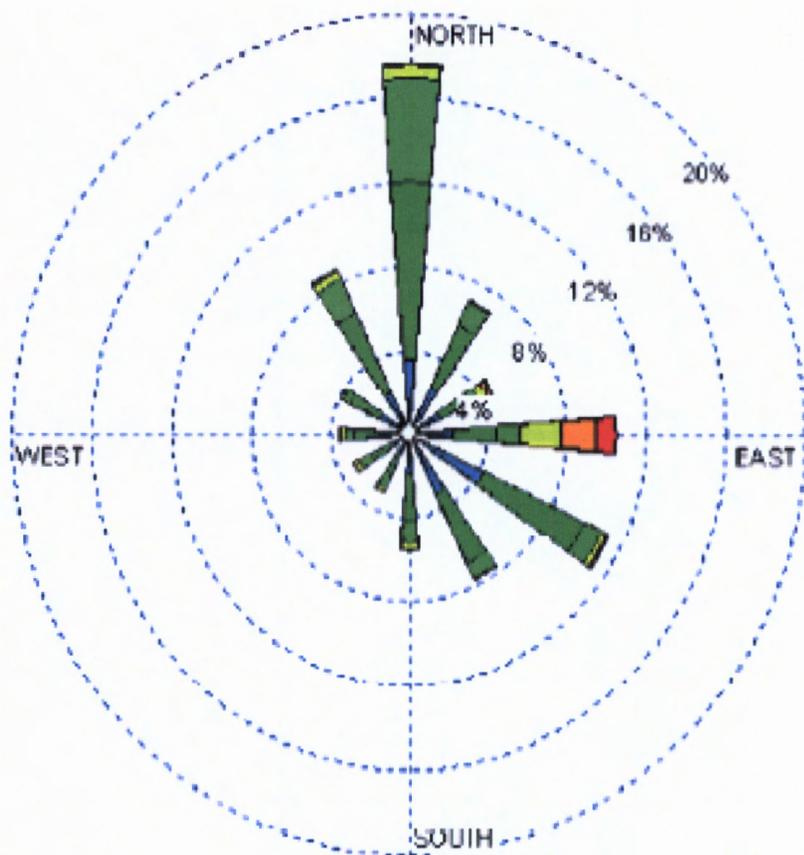


Figure 7 – Site Plan

Figure 8 – Wind Rose



Albuquerque Int'l Airport (23050)
 1985-2005
 Annual Average - 10-15Z
 Average Speed = 5.77 kt

WIND SPEED
 (Knots)

- >= 22
- 17 - 21
- 11 - 17
- 7 - 11
- 4 - 7
- 1 - 4

Calms: 13.33%

Figure 9 – Photographs of the Facility



Room A



Room B



Room C



Room D



Room E



Room F