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**FAX COVER SHEET**

DATE: May 19, 1995

TO: Stephanie Witkowski

COMPANY: Rinchem Company, Inc.

FAX NO.: (505) 344-9006

TELEPHONE: (505) 345-3655

MESSAGE: Stephanie, this is the fax that you have requested a  
copy of. This information appears in EPA's Model RCRA Permit  
for Hazardous Waste Management Facilities. This information will  
appear in Rinchem Company, Inc. permit as Module III - Contain-  
ers.

FROM: Phillip Solano NO. OF PAGES: Six  
(including cover page)

COMPANY: NEW MEXICO ENVIRONMENT DEPARTMENT  
HAZARDOUS & RADIOACTIVE MATERIALS BUREAU

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MODULE III - CONTAINERS

[Note: This permit module should be included when the Permittee is storing or treating hazardous waste in containers. The Permit Writer should specify in the title whether this module is for storage or treatment in containers. Waste analysis requirements (40 CFR 264.13) and closure requirements (40 CFR 264.178) for storage and treatment in containers normally are contained as attachments to the Permit in the Waste Analysis Plan and Closure Plan.]

[Note: In general, a single permit module should be used if multiple container areas will be covered by the same Permit for a given facility. However, it is acceptable to include multiple container modules if, in the Permit Writer's judgment, the characteristics and permit conditions for each area are sufficiently different to warrant multiple modules.]

[Note: The Permit Writer should refer to the RCRA Permit Quality Protocol for additional guidance in developing or reviewing permit conditions. See discussion of the RCRA Permit Quality Protocol in the Introduction to this Model Permit.]

III.A. MODULE HIGHLIGHTS

[The Permit Writer should include a general discussion of the activities covered by this module. The discussion should contain the following information: description and dimensions of each container area, maximum amount and type(s) of wastes that may be handled, description of the containers used, description and capacities of primary and secondary containment systems, any unique or special features associated with the activity, and a reference to any special permit conditions.]

III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

- III.B.1. The Permittee may \_\_\_\_\_ [specify store and/or treat] the following wastes in containers at the facility, subject to the terms of this Permit and as follows:

<u>Description of Hazardous Waste</u>	<u>EPA Hazardous Waste Number</u>	<u>Maximum Volume</u>	<u>Maximum Number and Type of Containers</u>
[Example: Waste Halogenated Solvents	F001	11,000 gallons	200 55-gal. drums]

[Note: Under "Description of Hazardous Waste," the Permit Writer should provide only a brief generic description, not comprehensive

characteristics, where a Hazardous Waste Number is provided for reference.]

[Note: If the location is critical, the Permit should also specifically identify the location (e.g., room or storage bay) in which containers of waste may be stored and/or treated. For example, incompatible wastes might be restricted to designated storage bays.]

III.B.2. The Permittee is prohibited from storing or treating hazardous waste that is not identified in Permit Condition III.B.1.

[Note: The Permit Writer may also include here a list of specific wastes or materials that are prohibited.]

III.C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit. [40 CFR 264.171]

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall assure that the ability of the container to contain the waste is not impaired, as required. [40 CFR 264.172]

[Note: Specific procedures (e.g., testing of waste) or equipment required to assure compliance with Permit Condition III.D. should be included in the Permit by inserting a specific condition or by attaching procedures or equipment lists from the Part B Permit Application.]

III.E. MANAGEMENT OF CONTAINERS

The Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. [40 CFR 264.173]

III.F. CONTAINMENT SYSTEMS

[Note: This condition should be included in the Permit only if the container area must have a secondary containment system under 40 CFR 264.175.]

The Permittee shall [construct and] maintain the containment system in accordance with the attached plans and specifications, contained in Permit Attachment III-1. [40 CFR 264.175]

III.G. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect the container area weekly, in accordance with the Inspection Schedule, Permit Attachment II-3, to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors. [40 CFR 264.174]

III.H. RECORDKEEPING

The Permittee shall place the results of all waste analyses and trial tests [and any other documentation showing compliance with the requirements of Permit Conditions III.K.1 and III.K.2 and 40 CFR 264.17(b) and 264.177] in the facility operating record. [40 CFR 264.73]

III.I. CLOSURE

At closure of the container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the Closure Plan, Permit Attachment II-9. [40 CFR 264.178]

III.J. SPECIAL CONTAINER PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

[Note: Permit Condition III.J should be included in the Permit only if ignitable or reactive wastes will be stored or treated in containers or is of concern (i.e., not prohibited in III.B.2.)]

III.J.1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line. [40 CFR 264.176]

III.J.2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures specified in Permit Attachment III-2. [40 CFR 264.17(a) and 264.176]

III.K. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

[Note: Permit Condition III.K should be included in the Permit only if incompatible wastes will be stored or is of concern at the facility.]

III.K.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container

unless the procedures in Permit Attachment III-3 are followed. [40 CFR 264.177(a)]

III.K.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material. [40 CFR 264.177(b)]

III.K.3. The Permittee shall separate containers of incompatible wastes. [40 CFR 264.177(c)]

[Note: The attached plans or procedures should address the layout of the hazardous waste storage facility, aisle space, and stacking height of containers holding ignitable and reactive wastes. Note that the National Fire Protection Association's Flammable and Combustible Liquids Code recommends that containers of ignitable waste be stored no more than two high.]

III.L. COMPLIANCE SCHEDULE

[Note: The Permit Writer should include this section if the Permittee is required to complete specific steps within a specific time period, beyond those covered by other conditions of the Permit, as a criteria for retaining this operating Permit. Compliance schedules are generally used in cases where requirements that are supposed to be met by the Permittee before the Permit is issued are deferred for good cause until after Permit issuance. Appropriate compliance schedules included in the Part B Permit Application should be attached to, or incorporated in, the Permit. If the application does not include a compliance schedule, the Permit Writer should prepare one and attach it to the Permit. Each compliance schedule should have at least two columns - one identifying the activity and one identifying the milestone or completion dates. The following is an example of a condition that may apply for a container area.]

The Permittee shall provide the following information to the Regional Administrator:

<u>Item</u>	<u>Date Due to the Regional Administrator</u>
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[Example:

1. Documentation that the surface of the containment system has been refinished with an impervious coating using the materials described in Specifications Section 19A, dated 3/18/88	June 26, 1989]
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PERMIT ATTACHMENTS REFERENCED IN MODULE III - CONTAINERS

This list is provided to assist the Permit Writer in checking that all Permit Attachments referenced in this module are attached to the Permit. The purpose of the numbering scheme used here is to facilitate cross-walking with the model permit conditions. The Permit Writer may select other numbering schemes, as appropriate, when preparing actual Permits.

<u>Permit Attachment No.</u>	<u>Plan or Document</u> (from the Part B Permit Application)
II-3	Facility Inspection Schedule
II-9	Closure Plan
III-1	Secondary Containment Plans and Specifications
III-2	Ignitable or Reactive Waste Procedures
III-3	Incompatible Waste Procedures