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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MULTIMEDIA PLANNING AND PERMITTING DIVISION
NEW MEXICO AND FEDERAL FACILITIES SECTION

PLEASE PRINT IN BLACK INK ONLY

TO: **Dr. Robert S. (Stu) Dinwiddie, Ph.D., Program Manager**

MACHINE NUMBER: 505.827.1544	VERIFICATION NUMBER:

FROM: James A. Harris, Jr.,   RCRA Facility Manager/Geologist   JAH

PHONE: (214) 665-8302	Mail Code: 6PD-N	
OFFICE: New Mexico/Federal Facilities Section		PAGES INCLUDING COVER SHEET: 3
DATE: May 25, 1999		

PLEASE NUMBER ALL PAGES

INFORMATION FOR SENDING FACSIMILE MESSAGES

EQUIPMENT:	FACSIMILE NUMBER:	VERIFICATION NUMBER:
PANAFAX UF-766	(214) 665-7263	(214) 665-8302

COMMENTS

Stu,

Cornelieus said you did not receive this. Here is a dated copy from our
fileroom. If you have questions please call me at (214) 665-8302.

MAY 1999
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April 29, 1999

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

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

Dear Dr. Dinwiddie:

On April 14, 199 the Environmental Protection Agency (EPA) received a copy of the
Draft Permit Renewal Application for Rinchem Company, Inc. Container Storage Unit, EPA ID
No. NMD002208627-1. The application also included your request to review and submit
comments to the Hazardous and Radioactive Materials Bureau within thirty (30) days.

EPA has reviewed the draft permit application. Our comments are enclosed for your
reference. If you have any questions or require additional information on EPA's review of the
Draft Permit Renewal Application for the Rinchem Company, Inc. Container Storage Unit please
contact me at (214) 665-6785 or James Harris of my staff at (214) 665-8302.

David Neleigh, Chief

Multi Media Permitting
 and Planning Division
New Mexico and Federal
 Facilities Section (6PD-N)

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RINCHEM COMPANY OPERATIONAL PERMIT RENEWAL APPLICATION, EPA NO. NMD002208627

This is a operating permit renewal application. Ten year duration effective 30 days from date of signature by the Secretary or Designee.

Facility consists of an approximately 23,000 sq-ft warehouse and office, loading/unloading dock, a back dock and two rainwater containment areas.

Units: Building containing the storage areas, the docks and the collection tank connected to the flammable storage area.

> Rooms E&F Storage Areas (capacity 82,000 gallaons); Rooms A&B (capacity 16,000 gallons) Controlled Temperture Storage Areas; Rooms C&D (capacity 80,000 and 74,000 gallons respectively) Storage Areas; Truck Loading Dock; Spill Drainage system; Spill collection Tank
>
> Room floors are sealed with epoxy, expansion joints are caulked; separated from adjacent rooms by two and four-hour fire-walls.

Waste Types: Prepacked chemicals for distribution, spent wastes, wastes sensitive to temperature changes; "D", "F", "K", "P", "U"

Facility indicates wastes will not store more than 55,000 gallons of hazardous waste on-site at any one time for up to a year until economic quantity loads can be transported.

If it is determined that a release has occurred the facility is required to perform BLRA/CMS and CMI to protect human health and the environment (N/A at this time).

Director of NMED has determined no RFI is required.

SIC codes have not been included in the permit application

INTERESTING POINTS

Page 100 of the Part B Application: The entire facility is referenced as a SWMU yet under "ACTIVE PERMITTED OPERATIONAL UNIT AREAS/SOLID WASTE MANAGEMENT UNIT INFORMATION", page 93, the facility is separated into two areas: the active permitted operational unit area and the rain water impoundments and drainage areas within the fenced boundaries are referenced as "possible" SWMUs.

Page numbers are not continuous throughout the application.