

Rinchem ENTERED

September 20, 2007

Stephen Connolly  
New Mexico Environment Department  
Hazardous Waste Bureau

RE: Hazardous Waste Spill  
Rinchem Co., Inc. NMD002208627

Dear Mr. Connolly;

Overview:

This letter is to serve as the seven day report outlining the events of the hazardous waste spill of 250 gallons involving a flammable liquid hazardous waste (D001, F003), from manifest tracking number 000923024 FLE, that was reported to you by phone on September 13, 2007 at approximately 1:35pm. The spill happened at the Rinchem Co., Inc. location at 6133 Edith Blvd. NE, Albuquerque, NM at 1:00pm.

Incident:

A Rinchem Warehouseman was unloading a tote container from a truck on the dock. While in the process of picking up and backing out of the truck, the tote container was caught on the E-track metal fixture. The container was punctured near the bottom of the container on the side. Approximately 250 gallons were released from the 330 gallon container. The released material was contained within the truck, in concrete containment sumps and surrounding asphalt. The remaining material within the damaged tote was transferred into another tote (estimated 80 gallons). Approximately 170 gallons was recovered from the containment sumps and placed into the new tote container and the remaining material and residues within the truck and surrounding asphalt were absorbed with clay absorbent and containerized. The area was secured and excavation equipment was ordered for the soil investigation for the following day.

Excavation and Sampling:

All contaminated asphalt was removed and the underlying soil was investigated for signs of contamination. Stains were visible within the soil. The stained area was sampled and the excavation began. The excavation continued until there were no signs of visible contamination present. Approximately 40 cubic yards of asphalt and soil were removed and placed into three roll-off containers. After the approximately 40 cubic yards were excavated, three confirmation samples were taken from throughout the excavated area to verify that the contamination was removed.

Sample results are as follows:

Sample number	Location	Analyte	Result	Comment
Dirty	Stained soil	Naphthalene	<b>1.8 mg/kg</b>	Method 8260
		1-methylnaphthene	ND	Method 8260
		2-methylnaphthene	ND	Method 8260
		Acetone	<b>280 mg/kg</b>	Method 8260
Clean 1	Excavation bottom Southwest	Naphthalene	ND	Method 8260
		1-methylnaphthene	ND	Method 8260
		2-methylnaphthene	ND	Method 8260
		Acetone	ND	Method 8260
Clean 2	Excavation bottom Southeast	Naphthalene	ND	Method 8260
		1-methylnaphthene	ND	Method 8260
		2-methylnaphthene	ND	Method 8260
		Acetone	ND	Method 8260
Clean 3	Excavation bottom North Center	Naphthalene	ND	Method 8260
		1-methylnaphthene	ND	Method 8260
		2-methylnaphthene	ND	Method 8260
		Acetone	ND	Method 8260

Based on the analytical above the excavation is believed to be complete.

**Classification of Contaminated Soil:**

The soil that was generated from the excavation no longer exhibits the characteristics of the material that was released. Based on 40 CFR 261.3 (g)(1) the soil is not a hazardous waste. Additionally, the generated soil is below the 10 times Universal Treatment Standard requirement as stated in 40 CFR 268.49 (c)(1)(C) and again in 40 CFR 268.49(d), thus this material requires no further treatment prior to being properly disposed.

We believe this is the appropriate classification of the soil generated based on the regulations stated above. All the appropriate notification has been done regarding this release. We would like to dispose of the generated material within 30 days. If you feel this is not appropriate please contact us within the thirty days so we can dispose of the material within a timely manner.

Should you have any questions please contact me at 505.998.4153.

Sincerely,

John Fitzsimons, CHMM  
 Quality, ES&H Manger  
 Rinchem Co., Inc.