



BRUCE KING  
GOVERNOR

State of New Mexico  
ENVIRONMENTAL DEPARTMENT  
Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2850



**ENTERED** RON CURRY  
DEPUTY SECRETARY

GRCB91  
file Giant 91  
JUDITH M. ESPINOSA  
SECRETARY

**M E M O R A N D U M**

TO: File

FROM: Steve Alexander, Water Resources Specialist  
Hazardous and Radioactive Materials Bureau

THROUGH: Bruce Swanton, Compliance Supervisor  
Hazardous and Radioactive Materials Bureau

DATE: December 11, 1991

SUBJECT: **INFORMAL MEETING WITH GIANT REFINING COMPANY ON  
PERMITTING REQUIREMENTS AND MODIFICATIONS**

-----

On December 10, 1991 Hazardous and Radioactive Materials Bureau (HRMB) personnel met with Lynn Shelton, Giant Refining Company (GRC). The meeting was an informal discussion addressing the air stripper (start up date: 9/90) installed at GRC to remove benzene from discharges to the facility "evaporation lagoons". In addition, the attendees discussed including F037 waste in GRC's waste stream for treatment as K051 waste. Also discussed, in general terms, were the anticipated modifications to GRC's existing permit. Those present were:

HRMB  
Herb Grover, Permitting  
Marc Sides, Permitting  
Bruce Swanton, Enforcement  
Steve Alexander, Enforcement

GRC  
Lynn Shelton, Environmental  
Management

COMMENTS

Lynn: Claud Rosendale (former Environmental Manager-GRC) filed a revised Part A with EPA and that GRC considers the air stripper to be in interim status. Claud's reasoning was that the stripper was a component of the existing air treatment system (evaporative lagoons). EPA responded that the air stripper was not a component of the existing treatment unit but was a new unit, at a different location.

Giant Refining Co.  
December 11, 1991  
page 2

Herb: Due to the classification of the air stripper unit as a process vent (Subpart AA, BB) GRC is currently out of compliance. The modification required of the permit is a class III. GRC can apply for temporary authorization, lasting 180 days, with one 180 day extension allowed (Section 264.1032). Estimates turnaround time of two months for HRMB review of class III modification.

Lynn: GRC is investigating the possibility of including F037 waste (primary settling waste in sump of septic tank) in K051 waste stream for treatment in API separator.

Bruce: Based on the description, the sump waste appears to be similar to K051 waste. Treating the sump waste in the API Separator is believed to be appropriate.

Steve: HRMB is finalizing several proposed modifications to the GRC permit. More specifically, past analysis of the Detection Monitoring indicator parameters has shown statistically significant changes for both pH and EC in the downgradient wells, when compared to the background well MW-4. Those results required the facility to conduct assessment monitoring sampling and analysis. Analysis of the assessment monitoring sampling did not indicate that a release to groundwater had occurred.

To provide a more effective groundwater monitoring program the modifications currently being considered are:

1. Discontinuing use of the current background well, MW-4.
2. Approving use of Observation Well OW-11 as a background well, to replace MW-4.
3. Establishing background levels for metals from OW-11 groundwater quality data and utilizing MCL's as the "trigger" in Detection Monitoring.
4. Having the facility analyze groundwater samples periodically for volatile organics.

HRMB does not view the four possible modifications discussed as having been formalized or complete. Permit modifications have a "ripple" effect within a permit and additional modifications are expected.

xc: Lynn Shelton, Giant Refining Company  
Ed Horst, NMED  
Bruce Swanton, NMED  
Herb Grover, NMED  
Marc Sides, NMED