

Know

*File
Giant*



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April 24, 1996

John J. Stokes, General Manager
Giant Refining Company - Bloomfield
P.O. Box 159
Bloomfield, New Mexico 87413

Dear Mr. Stokes:

RE: **New Mexico RCRA Corrective Action Authorization and the Flow
of Corrective Action Documents**

On January 26, 1996, a Federal Register notice announced that New Mexico had received authorization from the U.S. Environmental Protection Agency (EPA) for the Corrective Action (CA) component of the Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The New Mexico Environment Department (NMED) is now the Administrative Authority for HSWA CA, and the Hazardous and Radioactive Materials Bureau (HRMB) is the implementing organization for HSWA CA within NMED. HRMB now has authority and is the responsible agency for both the HSWA Permit Module, as well as the base RCRA Permit(s) for your facility.

NMED and EPA have entered into a "Workshare Agreement" currently whereby EPA will assist NMED with specific HSWA activities at the facility. EPA will forward any comments or other HSWA CA-related information to NMED. NMED will incorporate EPA comments on CA documents for transmittal to the facility. Additionally, NMED will provide for all required public notices and meetings for permit modifications, issue final decisions, and make regulatory notifications.

To ensure an appropriate flow of HSWA CA correspondence and documents between NMED and the facility, the following procedural guidelines shall be adhered to by NMED and the facility. NMED will transmit all comments on CA documents (e.g. Notices of Deficiency, approval letters, and permit modification information) to you, as the facility contact, or to your designated representative. The facility shall send an original response and any document related to HSWA CA to me and a copy for the following persons, unless stipulated otherwise by NMED:

- Ronald Kern, Manager, RCRA Technical Compliance Program, NMED/HRMB
- Barbara Hoditschek, Manager, RCRA Permits Program, NMED/HRMB
- David Neleigh, Chief, New Mexico Federal Facilities Section, EPA Region 6

CHRONOLOGICAL LIST OF REGULATORY ACTIVITIES
PERTAINING TO POTENTIAL GROUNDWATER
CONTAMINATION
AT THE BLOOMFIELD SITE
1977 - 1996

PREPARED FOR
NEW MEXICO OIL CONSRVATION DIVISION
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GIANT REFINING COMPANY - BLOOMFIELD REFINERY

FEBRUARY 28, 1996

CHRONOLOGICAL LIST OF REGULATORY ACTIVITIES
PERTAINING TO GROUNDWATER AND POTENTIAL
CONTRIBUTIONS TO GROUNDWATER
AT THE BLOOMFIELD SITE
1977 - 1996

INTRODUCTION:

On December 19, 1996, Roger Anderson, Bill Olson, Pat Sanchez, Denny Foust and Mark Ashley of the New Mexico Oil Conservation, along with John Stokes and Lynn Shelton of Giant Refining Company, met at the OCD offices in Santa Fe to discuss the recent release of a sheen into the San Juan River.

In addition to sampling requirements from the San Juan River and from two planned soil borings, the OCD requested that Giant submit a "Summary Report" of the actions and findings of the facility to date beginning with the initial Discharge plan dated June 5, 1978. You will notice that the report goes back to September 30, 1977, the date of the completion of the draft Discharge Plan.

What follows is a synopsis of the regulatory activities concerning groundwater and possible contributors to groundwater that have occurred at this site since 1977 as they are contained in our files. Please note that there have been two changes of ownership and an office fire since that time and surviving files are assumed to be complete.

Please note also that the descriptions of each item of the report are necessarily brief as there are 44 instances of significant contact with the OCD and 29 with the United States Environmental Protection Agency that can be considered germane to this report. These reports and correspondence can be inspected at the facility by arrangement.

OCD

CORRESPONDENCE. PLANS AND REPORTS

Receipt by facility of the **Discharge and Monitoring Plan for a Refinery Operated by Plateau, Inc. near Bloomfield, New Mexico**, September 30, 1977, *American Groundwater Consultants, Inc.*

- Referenced facilities first notification of application for a discharge permit.
- Involved written correspondence dated: 4/29/77,5/13/77,5/23/77,
- 12/8/77,4/4/78
- Cobble Zone dry by test

Milestone Report on Monitoring Activities at the Bloomfield Refinery Operated by Plateau, Inc., San Juan County, New Mexico, January 30, 1979, American Groundwater Consultants, Inc.

- Discharge plan Approval - June 5, 1978
- Slope - N to NW at 1.2°
- Pond Seepage - 22 gpm

May 14, 1981 Application to EPA for NPDES

July 23, 1981 Letter re: Oscar Simpson

September 10, 1981 Letter concerning meeting with OCD to discuss new sample requirements

October 8, 1981 Submission to EPA of Discharge and Monitoring plans as documentation for waiver of groundwater monitoring requirement

December 23, 1981 Letter - reference to supplement to Discharge Plan

January 8, 1982 Letter - Report of diesel in Hammond Ditch

• Reference to filling bank of Hammond Ditch with water which then drains during winter when it the ditch is dry

Update Discharge Plan for a Refinery Operated by Plateau, Inc. near Bloomfield, New Mexico, March 9, 1982, American Groundwater Consultants, Inc.

- Incorporates runoff controls and spray irrigation

July 19, 1982 Letter What is need for a Discharge Plan?

September 2, 1982 Letter San Juan River as a Hydraulic barrier

Undated Letter from OCD Need for impermeable storage

January 6, 1983 Letter Lining oily water ponds

June 29, 1983 Letter to EPA Requesting copy of the inspection report and sample analysis performed by Ecology & Environment, Inc. for EPA

August 8, 1983 Letter Request for copy of inspection report by J. K. O'Neal (EPA)

1983 Letter Associated with OCD Notice of Violation

September 19, 1983 Letter From Daniel B. Stephens concerning the need for additional site assessment and 13 additional groundwater wells.

September 26, 1983 Letter Summary of activities at Plateau from David Boyer, OCD

October 21, 1983 Letter Discharge Plan deficiencies

November 14, 1983 Letter to OCD Agreeing to additional controls and characterization

February 14, 1984 Letter to OCD Status report - 6 wells drilled

March 1, 1984 Draft of discharge permit renewal

March 29, 1984 Letter Seeps at bliff from Hammond Ditch and evaporation ponds

April 11, 1984 Letter Dr. Turner (AGC, Inc.) addressing seeps, water contours, etal.

May 9, 1984 Letter WACC granting authority of water pollution control

June 7, 1984 Letter Monitoring frequency

Discharge plan for Plateau Refinery at Bloomfield, New Mexico, March 24, 1984, American Groundwater Consultants, Inc., Groundwater Monitoring Emergency Plan

June 7, 1984 Discharged plan approval

February 5, 1985 Letter from OCD First reference to 3013 order

March 4, 1986 Letter from OCD Directed to delineate extent of hydrocarbon contamination and begin recovery actions

Report on Subsurface Hydrocarbon Data at the Bloomfield Refinery, May 29, 1986, *Engineering Science*

Remedial Action Plan for Bloomfield Refinery, Bloomfield, New Mexico June 6, 1986, *Engineering Science*

July 30, 1986 Letter from OCD Request for more complete delineation

October 24, 1986 Letter form OCD Stricter requirement, additional wells

Proposal to Install Monitor Wells and Oil Recover Systems at the Bloomfield Refining Company, February 4, 1987, GCL

October 27, 1987 Letter to GCL Mention of damming Hammond Ditch

February 23, 1988 Letter from OCD Warning of enforcement action

Site Investigation and Remedial Action Conceptual Design for the Bloomfield Refining Company, March 4, 1988, GCL

May 13, 1988 Letter from OCD Additional requirements

July 8, 1988 Letter Soil vapor survey

Work Plan for Soil Vapor Survey and Monitor Well Installation Bloomfield Refining Company, August 5, 1988, GCL

Report on Soil Vapor Survey, Well Installation, and Hydrocarbon Recovery System, Bloomfield Refining Company, February 24, 1989

May 22, 1989 Letter from OCD Critique of "Soil Vapor ... Refining Company" (March 7, 1989), request for meeting

Final Report on Soil Vapor Survey, Well Installation, and Hydrocarbon Recovery System, Bloomfield Refining Company, August 3, 1989, GCL

November 18, 1991 Discharge Plan Renewal OCD

February 4, 1992 Letter to/from OCD Directing all closure plans approved by OCD

June 1994 Discharge plan approved monitor MW-1 and MW-4 quarterly

RCRA

CORRESPONDENCE, PLANS AND REPORTS

March 27, 1985 and November 1985 Notification of HSWA - need for Part B permit

January 11, 1982 Letter OCD - Chavez - OCED does have authority to monitor clean up of seep

A Review of Subsurface Hydrocarbons at the Bloomfield Refinery January 31, 1985, *Engineering Science*

Large oil spill - river terrace affected - 1963 (2500 bbls)

January 19, 1984 Letter to EPA from EID Reference EPA Region VI as reviewing possible violations/non-compliance to RCRA

June 20, 1984 Letter to EPA Earliest reference to 3013

October 23, 1984 Notes References 3/84 EPA and NMEID inspection and 3/83 inspection

3013 draft order (no date?) assemble info on groundwater

April 2, 1985 Official 3013 received

April 1985 Draft from Joseph Guida, confrontation determination of hazardous waste. No EPA jurisdiction over BRC concerning RCRA

Petroleum product contamination of soil and water in New Mexico 1984, undated, NMID OCD authority

July 5, 1985 Letter for OCD to GWEC Sampling requirements

Monitoring, testing, Analysis, and Reporting at the Bloomfield Refinery, July 1985, *Engineering Science* Proposed field investigation, additional wells

A final report on Section 3013 Administrative order work elements, undated, *Engineering Science*

April 1, 1985 Received compliance order pursuant to 3008H compliance order

November 26, 1985 Assessment of civil penalty

December 2, 1986 EID Nov - TSD status

Final Closure Plan for the API Wastewater Pond, Landfill and Landfill Pond at the Bloomfield Refinery, July 1986, *Engineering Science*

Final Closure Plan for the API Wastewater Ponds, Landfill and Landfill Pond at teh Bloomfield Refinery, July, 1986, *Engineering Science*

January 25, 1984 Reference to 3008(h) order closure plan approval (landfill pond)

April 19, 1991 Delisting petition

August 1985 Clarification of antimony and selenium

February 19, 1986 Letter from EPA 3007(a) request hazardous waste study

December 31, 1992 Receipt of negotiated 3000(h) compliance order

300H(n) -

1. Perform interim measures
2. Perform RFI
3. Perform and submit CMS

Interim measures - Plan February 1993

1. To mitigate current or potential threats to human health or the environment
2. Notification if threat exists

RCRA Facility Investigation / Corrective Measures Study Report, Bloomfield Refining Company, #50 County Road 4990, Bloomfield, New Mexico, November 8, 1994, *Groundwater Technologies, Inc.*

Corrective Measure Study Report, Giant Refining Company, #50 County Road 4990, Bloomfield, New Mexico, December 21, 1995, *Groundwater Technologies, Inc.*

December 3, 1996 Letter To OCD Notification of sheen on San Juan River and mitigation activities