

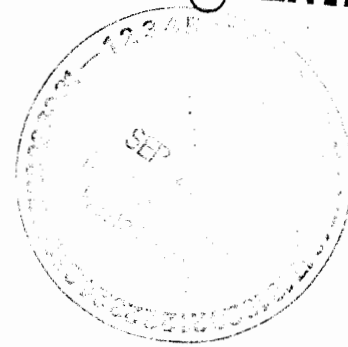
GRCB 040



ENTERED

GIANT

REFINING COMPANY



Mr. Wayne Price
New Mexico Oil Conservation Division
1220 South St. Frances Dr.
Santa Fe, New Mexico 87505

September 8, 2004

Re: **Soil Final Disposition-Release North of MW #45**

Dear Mr. Price,

As you are aware of Giant Refining Company – Bloomfield Refinery removed all the impacted soil from the release North of Monitoring Well #45 as directed in the “Emergency Action Directive”. The heavily impacted soil was sampled, removed and placed into 55-gallon drums. The remainder of the soil placed into staging piles. The staging piles were segregated into two categories based upon visual inspection of the soil.

Giant collected composite samples from the staging piles of each category. All samples were analyzed for Method 6010C (RCRA 8 metals) TCLP, BTEX, Reactivity, Corrosivity, Ignitability, Flash point, and TPH.

The following is a summary of sample results including quantity of material:

1. Drummed Soil (16 barrels)
 - BTEX – Hazardous for Benzene
 - TCLP –

Arsenic	0.009 (mg/Kg)
Barium	0.422 (mg/Kg)
Cadmium	ND
Chromium	0.002 (mg/Kg)
Lead	0.001 (mg/Kg)
Mercury	ND
Selenium	0.006 (mg/Kg)
Silver	ND
 - TPH – 9280 (mg/Kg)
2. Hydro Blast Pad Composite (1200 cubic yards)
 - BTEX – Non-hazardous for any chemical.

Benzene	= .097 (mg/Kg)
Total BTEX	= .722 (mg/Kg)

PHONE
505-632-8013
FAX
505-632-3911

50 ROAD 4990
P.O. BOX 159
BLOOMFIELD
NEW MEXICO
87413

- TCLP-

Arsenic	0.002 (mg/Kg)
Barium	0.068 (mg/Kg)
Cadmium	ND
Chromium	0.001 (mg/Kg)
Lead	ND
Mercury	ND
Selenium	ND
Silver	ND

- TPH – 301 (mg/kg)
 - GRO = 57.2 (mg/Kg)
 - DRO = 244 (mg/Kg)

- Ignitability – Negative
- Corrosivity – Negative
- Reactivity – Negative
- PH = 7.43
- Flash Point >350 C

3. Tank 36 Composite (3600 cubic yards)

- BTEX – Non-hazardous for any chemical.
 - Benzene = .011 (mg/Kg)
 - Total BTEX = .149 (mg/Kg)

- TCLP-

Arsenic	0.003 (mg/Kg)
Barium	0.073 (mg/Kg)
Cadmium	ND
Chromium	0.001 (mg/Kg)
Lead	ND
Mercury	ND
Selenium	ND
Silver	ND

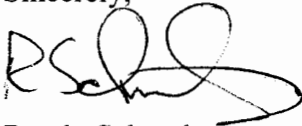
- TPH – 351 (mg/kg)
 - GRO = 85.1 (mg/Kg)
 - DRO = 266 (mg/Kg)

- Ignitability – Negative
- Corrosivity – Negative
- Reactivity – Negative
- PH = 7.69
- Flash Point >350 C

Based on these results Giant will send the 16 barrels of soil to an EPA permitted TSD facility. Giant requests the Agency's permission to use the remaining soil for beneficial use at the refinery (dike material and leveling low lying areas).

Your prompt attention to this matter will be greatly appreciated. If you need more information, please contact me at (505) 632-4171.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Schmaltz', with a large, stylized flourish at the end.

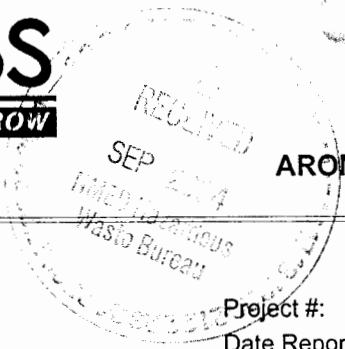
Randy Schmaltz
Environmental Supervisor
Giant Refining Company – Bloomfield

Cc: Hope Monzeglio, NMED
Denny Foust, New Mexico Oil Conservation Division – Aztec
Ed Riege

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS



Client:	Giant	Project #:	96012-028
Sample ID:	001	Date Reported:	08-18-04
Laboratory Number:	30030	Date Sampled:	08-13-04
Chain of Custody:	12752	Date Received:	08-13-04
Sample Matrix:	Soil	Date Analyzed:	08-18-04
Preservative:	Cool	Date Extracted:	08-16-04
Condition:	Cool & Intact	Analysis Requested:	BTEX-MTBE

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Methyl-tert-butyl Ether	ND	2.1
Benzene	1,190	1.8
Toluene	671	1.7
Ethylbenzene	792	1.5
p,m-Xylene	2,180	2.2
o-Xylene	728	1.0
Total BTEX	5,560	

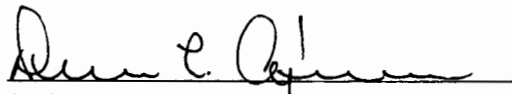
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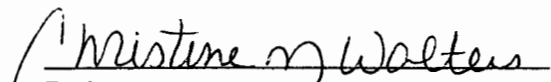
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	99 %
	1,4-difluorobenzene	99 %
	Bromochlorobenzene	99 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Outfall Area Top of Spill.**


Analyst


Review

EPA METHOD 8015 Modified
Nonhalogenated Volatile Organics
Total Petroleum Hydrocarbons

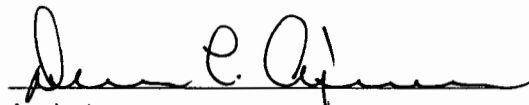
Client:	Giant	Project #:	96012-028
Sample ID:	001	Date Reported:	08-18-04
Laboratory Number:	30030	Date Sampled:	08-13-04
Chain of Custody No:	12752	Date Received:	08-13-04
Sample Matrix:	Soil	Date Extracted:	08-16-04
Preservative:	Cool	Date Analyzed:	08-18-04
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

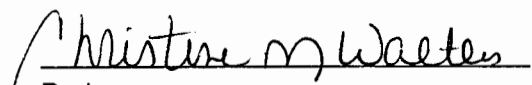
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	3,880	0.2
Diesel Range (C10 - C28)	5,400	0.1
Total Petroleum Hydrocarbons	9,280	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: **Outfall Area Top of Spill.**


Analyst


Review

Client:	Giant	Project #:	96012-028
Sample ID:	001	Date Reported:	08-17-04
Laboratory Number:	30030	Date Sampled:	08-13-04
Chain of Custody:	12752	Date Received:	08-13-04
Sample Matrix:	Soil	Date Analyzed:	08-17-04
Preservative:	Cool	Date Digested:	08-16-04
Condition:	Cool & Intact	Analysis Needed:	RCRA Metals

Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)	TCLP Regulatory Level (mg/Kg)
Arsenic	0.009	0.001	5.0
Barium	0.422	0.001	100
Cadmium	ND	0.001	1.0
Chromium	0.002	0.001	5.0
Lead	0.001	0.001	5.0
Mercury	ND	0.001	0.2
Selenium	0.006	0.001	1.0
Silver	ND	0.001	5.0

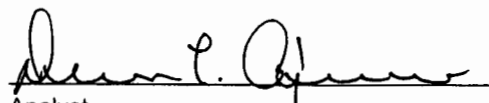
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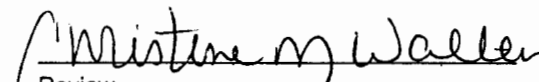
References: Method 3050B, Acid Digestion of Sediments, Sludges and Soils.
SW-846, USEPA, December 1996.

Method 6010B, Analysis of Metals by Inductively Coupled Plasma Atomic Emission Spectroscopy, SW-846, USEPA, December 1996.

Note: Regulatory Limits based on 40 CFR part 261 subpart C
section 261.24, August 24, 1998.

Comments: **Outfall Area Top of Spill.**


Analyst


Review

Client:	Giant	Project #:	96012-028
Sample ID:	001	Date Reported:	08-19-04
Laboratory Number:	30057	Date Sampled:	08-14-04
Chain of Custody:	12756	Date Received:	08-14-04
Sample Matrix:	Soil Extract	Date Extracted:	08-17-04
Preservative:	Cool	Date Analyzed:	08-18-04
Condition:	Cool & Intact		

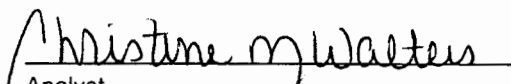
Parameter	Analytical Result	Units		Units
pH	8.00	s.u.		
Conductivity @ 25° C	267	umhos/cm		
Total Dissolved Solids @ 180C	236	mg/L		
Total Dissolved Solids (Calc)	218	mg/L		
SAR	1.8	ratio		
Total Alkalinity as CaCO3	53.6	mg/L		
Total Hardness as CaCO3	88.0	mg/L		
Bicarbonate as HCO3	53.6	mg/L	0.88	meq/L
Carbonate as CO3	<0.1	mg/L	0.00	meq/L
Hydroxide as OH	<0.1	mg/L	0.00	meq/L
Nitrate Nitrogen	1.7	mg/L	0.03	meq/L
Nitrite Nitrogen	0.025	mg/L	0.00	meq/L
Chloride	28.8	mg/L	0.81	meq/L
Fluoride	0.27	mg/L	0.01	meq/L
Phosphate	8.3	mg/L	0.26	meq/L
Sulfate	74.0	mg/L	1.54	meq/L
Iron	0.266	mg/L	0.01	meq/L
Calcium	25.6	mg/L	1.28	meq/L
Magnesium	5.86	mg/L	0.48	meq/L
Potassium	2.08	mg/L	0.05	meq/L
Sodium	39.0	mg/L	1.70	meq/L
Cations			3.52	meq/L
Anions			3.54	meq/L

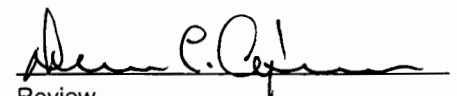
Cation/Anion Difference

0.48%

Reference: U.S.E.P.A., 600/4-79-020, "Methods for Chemical Analysis of Water and Wastes", 1983.
Water And Waste Water", 18th ed., 1992.

Comments: Outfall Area Top of Spill.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

September 6, 2004

Mr. Randy Schmaltz
Giant Refinery
P.O. Box 159
Bloomfield, NM 87413

Phone: (505) 632-4171

Client No.: 96012-009

Dear Mr. Schmaltz,

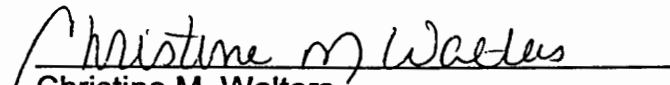
Enclosed are the analytical results for the soil samples collected by Giant designated personnel on 8/31/04, and received by the Envirotech laboratory on 8/31/04 for Total Petroleum Hydrocarbons (TPH) per USEPA Method 8015, BTEX per USEPA Method 8021, RCRA 8 List Metals, Flashpoint, Ignitability, Corrosivity and Reactivity analysis..

The samples were documented on Envirotech Chain of Custody No. 12882. The samples were assigned Laboratory Nos. 30341 (Hydroblast Comp) and 30342 (Tank 36 Comp) for tracking purposes.

The samples were analyzed on 9/01/04 and 9/02/04 using USEPA or equivalent methods.

Should you have any questions or require additional information, please do not hesitate to contact us at (505) 632-0615.

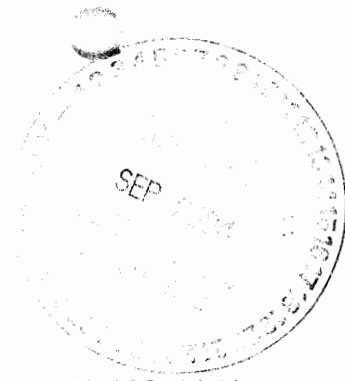
Respectfully submitted,
Envirotech, Inc.


Christine M. Walters
Laboratory Coordinator / Environmental Scientist

enc.

CMW/cmw

C:/files/labreports/Giant.wpd



ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Hydroblast Comp.	Date Reported:	09-01-04
Laboratory Number:	30341	Date Sampled:	08-31-04
Chain of Custody:	12882	Date Received:	08-31-04
Sample Matrix:	Soil	Date Analyzed:	09-01-04
Preservative:	Cool	Date Extracted:	09-01-04
Condition:	Cool & Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	97.4	1.8
Toluene	85.9	1.7
Ethylbenzene	105	1.5
p,m-Xylene	285	2.2
o-Xylene	149	1.0
Total BTEX	722	

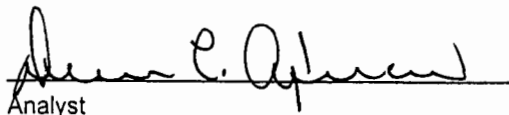
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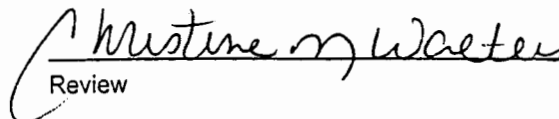
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	95 %
	1,4-difluorobenzene	95 %
	Bromochlorobenzene	95 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments:


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Tank 36 Comp.	Date Reported:	09-01-04
Laboratory Number:	30342	Date Sampled:	08-31-04
Chain of Custody:	12882	Date Received:	08-31-04
Sample Matrix:	Soil	Date Analyzed:	09-01-04
Preservative:	Cool	Date Extracted:	09-01-04
Condition:	Cool & Intact	Analysis Requested:	BTEX

Parameter	Concentration (ug/Kg)	Det. Limit (ug/Kg)
Benzene	11.3	1.8
Toluene	14.6	1.7
Ethylbenzene	14.0	1.5
p,m-Xylene	50.1	2.2
o-Xylene	58.8	1.0
Total BTEX	149	

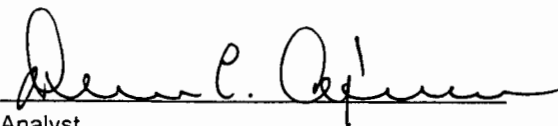
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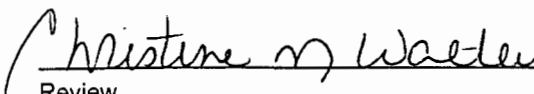
Surrogate Recoveries:	Parameter	Percent Recovery
	Fluorobenzene	95 %
	1,4-difluorobenzene	95 %
	Bromochlorobenzene	95 %

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Method 8021B, Aromatic Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments:


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8021 AROMATIC VOLATILE ORGANICS

Client:	N/A	Project #:	N/A
Sample ID:	09-01-BTEX QA/QC	Date Reported:	09-01-04
Laboratory Number:	30341	Date Sampled:	N/A
Sample Matrix:	Soil	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	09-01-04
Condition:	N/A	Analysis:	BTEX

Calibration and Detection Limits (ug/L)	I-Cal RF:	C-Cal RF:	%Diff.	Blank Conc	Detect Limit
		Accept. Range 0 - 15%			
Benzene	2.8990E-001	2.9077E-001	0.3%	ND	0.2
Toluene	2.5460E-002	2.5511E-002	0.2%	ND	0.2
Ethylbenzene	3.8451E-002	3.8567E-002	0.3%	ND	0.2
p,m-Xylene	3.2988E-002	3.3088E-002	0.3%	ND	0.2
o-Xylene	3.3333E-002	3.3400E-002	0.2%	ND	0.1

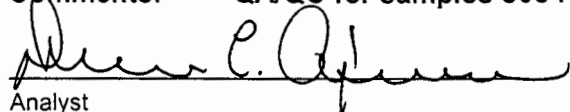
Duplicate Conc. (ug/Kg)	Sample	Duplicate	%Diff.	Accept Range	Detect Limit
Benzene	97.4	96.2	1.2%	0 - 30%	1.8
Toluene	85.9	84.2	2.0%	0 - 30%	1.7
Ethylbenzene	105	102	2.0%	0 - 30%	1.5
p,m-Xylene	285	281	1.2%	0 - 30%	2.2
o-Xylene	149	147	1.2%	0 - 30%	1.0

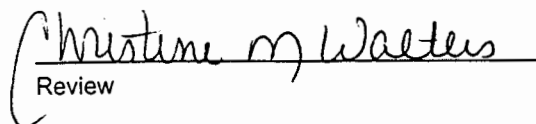
Spike Conc. (ug/Kg)	Sample	Amount Spiked	Spiked Sample	% Recovery	Accept Range
Benzene	97.4	50.0	147	99.9%	39 - 150
Toluene	85.9	50.0	135	99.6%	46 - 148
Ethylbenzene	105	50.0	154	99.8%	32 - 160
p,m-Xylene	285	100	384	99.8%	46 - 148
o-Xylene	149	50.0	198	99.7%	46 - 148

ND - Parameter not detected at the stated detection limit.

References: Method 5030B, Purge-and-Trap, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.
Method 8021B, Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors, SW-846, USEPA December 1996.

Comments: QA/QC for samples 30341 - 30342, 30345.


Analyst


Review

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Hydroblast Comp.	Date Reported:	09-01-04
Laboratory Number:	30341	Date Sampled:	08-31-04
Chain of Custody No:	12882	Date Received:	08-31-04
Sample Matrix:	Soil	Date Extracted:	09-01-04
Preservative:	Cool	Date Analyzed:	09-01-04
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

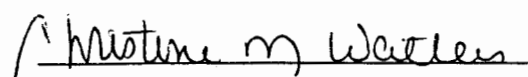
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	57.2	0.2
Diesel Range (C10 - C28)	244	0.1
Total Petroleum Hydrocarbons	301	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments:


Analyst


Review

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

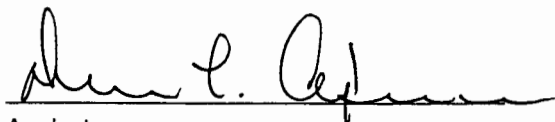
Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Tank 36 Comp.	Date Reported:	09-01-04
Laboratory Number:	30342	Date Sampled:	08-31-04
Chain of Custody No:	12882	Date Received:	08-31-04
Sample Matrix:	Soil	Date Extracted:	09-01-04
Preservative:	Cool	Date Analyzed:	09-01-04
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

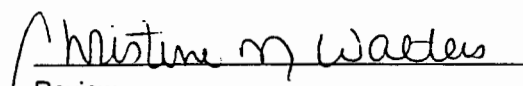
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	85.1	0.2
Diesel Range (C10 - C28)	266	0.1
Total Petroleum Hydrocarbons	351	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments:


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA Method 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

Quality Assurance Report

Client:	QA/QC	Project #:	N/A
Sample ID:	09-01-TPH QA/QC	Date Reported:	09-01-04
Laboratory Number:	30341	Date Sampled:	N/A
Sample Matrix:	Methylene Chloride	Date Received:	N/A
Preservative:	N/A	Date Analyzed:	09-01-04
Condition:	N/A	Analysis Requested:	TPH

	I-Cal Date	I-Cal RF:	C-Cal RF:	% Difference	Accept. Range
Gasoline Range C5 - C10	02-19-04	1.8591E-002	1.8572E-002	0.10%	0 - 15%
Diesel Range C10 - C28	02-19-04	1.5507E-002	1.5492E-002	0.10%	0 - 15%

Blank Conc. (mg/L - mg/Kg)	Concentration	Detection Limit
Gasoline Range C5 - C10	ND	0.2
Diesel Range C10 - C28	ND	0.1
Total Petroleum Hydrocarbons	ND	0.2

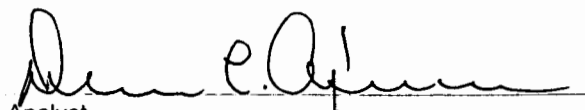
Duplicate Conc. (mg/Kg)	Sample	Duplicate	% Difference	Accept. Range
Gasoline Range C5 - C10	57.2	57.0	0.3%	0 - 30%
Diesel Range C10 - C28	244	243	0.3%	0 - 30%

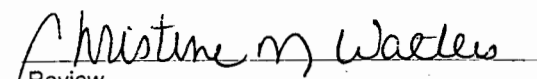
Spike Conc. (mg/Kg)	Sample	Spike Added	Spike Result	% Recovery	Accept. Range
Gasoline Range C5 - C10	57.2	250	307	99.8%	75 - 125%
Diesel Range C10 - C28	244	250	493	99.8%	75 - 125%

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: QA/QC for samples 30341 - 30345.


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

SUSPECTED HAZARDOUS WASTE ANALYSIS

Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Hydroblast Comp.	Date Reported:	09-01-04
Lab ID#:	30341	Date Sampled:	08-31-04
Sample Matrix:	Soil	Date Received:	08-31-04
Preservative:	Cool	Date Analyzed:	09-01-04
Condition:	Cool and Intact	Chain of Custody:	12882

Parameter	Result
-----------	--------

IGNITABILITY: **Negative**

CORROSIVITY: **Negative** **pH = 7.43**

REACTIVITY: **Negative**

RCRA Hazardous Waste Criteria

Parameter	Hazardous Waste Criterion
-----------	---------------------------

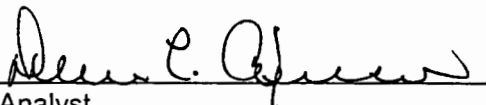
IGNITABILITY:	Characteristic of Ignitability as defined by 40 CFR, Subpart C, Sec. 261.21. (i.e. Sample ignition upon direct contact with flame or flash point < 60° C.)
---------------	---

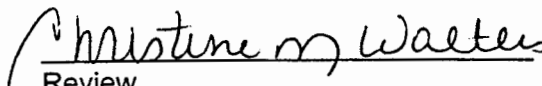
CORROSIVITY:	Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22. (i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5)
--------------	--

REACTIVITY:	Characteristic of Reactivity as defined by 40 CFR, Subpart C, Sec. 261.23. (i.e. Violent reaction with water, strong base, strong acid, or the generation of Sulfide or Cyanide gases at STP with pH between 2.0 and 12.5)
-------------	---

Reference: 40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

Comments:


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

SUSPECTED HAZARDOUS WASTE ANALYSIS

Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Tank 36 Comp.	Date Reported:	09-01-04
Lab ID#:	30342	Date Sampled:	08-31-04
Sample Matrix:	Soil	Date Received:	08-31-04
Preservative:	Cool	Date Analyzed:	09-01-04
Condition:	Cool and Intact	Chain of Custody:	12882

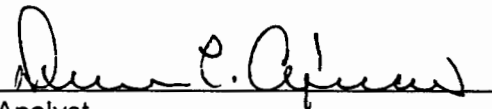
Parameter	Result
IGNITABILITY:	Negative
CORROSIVITY:	Negative pH = 7.69
REACTIVITY:	Negative

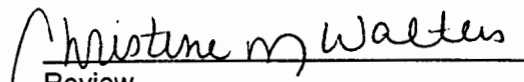
RCRA Hazardous Waste Criteria

Parameter	Hazardous Waste Criterion
IGNITABILITY:	Characteristic of Ignitability as defined by 40 CFR, Subpart C, Sec. 261.21. (i.e. Sample ignition upon direct contact with flame or flash point < 60° C.)
CORROSIVITY:	Characteristic of Corrosivity as defined by 40 CFR, Subpart C, Sec. 261.22. (i.e. pH less than or equal to 2.0 or pH greater than or equal to 12.5)
REACTIVITY:	Characteristic of Reactivity as defined by 40 CFR, Subpart C, Sec. 261.23. (i.e. Violent reaction with water, strong base, strong acid, or the generation of Sulfide or Cyanide gases at STP with pH between 2.0 and 12.5)

Reference: 40 CFR part 261 Subpart C sections 261.21 - 261.23, July 1, 1992.

Comments:


Analyst


Review

Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Hydroblast Comp.	Date Reported:	09-02-04
Laboratory Number:	30341	Date Sampled:	08-31-04
Chain of Custody:	12882	Date Received:	08-31-04
Sample Matrix:	TCLP Extract	Date Analyzed:	09-02-04
Preservative:	Cool	Date Extracted:	09-01-04
Condition:	Cool & Intact	Analysis Needed:	TCLP metals

Parameter	Concentration (mg/L)	Det. Limit (mg/L)	Regulatory Level (mg/L)
Arsenic	0.002	0.001	5.0
Barium	0.068	0.001	100
Cadmium	ND	0.001	1.0
Chromium	0.001	0.001	5.0
Lead	ND	0.001	5.0
Mercury	ND	0.001	0.2
Selenium	ND	0.001	1.0
Silver	ND	0.001	5.0

ND - Parameter not detected at the stated detection limit.

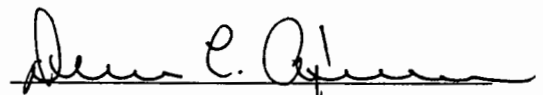
References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, December 1996.

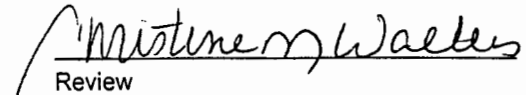
Methods 3010, 3020, Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, USEPA, December 1996.

Methods 6010B Analysis of Metals by Inductively Coupled Plasma-Atomic Emission SW-846, USEPA. December 1996.

Note: Regulatory Limits based on 40 CFR part 261 subpart C section 261.24, August 24, 1998.

Comments:


 Analyst


 Review

Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Tank 36 Comp.	Date Reported:	09-02-04
Laboratory Number:	30342	Date Sampled:	08-31-04
Chain of Custody:	12882	Date Received:	08-31-04
Sample Matrix:	TCLP Extract	Date Analyzed:	09-02-04
Preservative:	Cool	Date Extracted:	09-01-04
Condition:	Cool & Intact	Analysis Needed:	TCLP metals

Parameter	Concentration (mg/L)	Det. Limit (mg/L)	Regulatory Level (mg/L)
Arsenic	0.003	0.001	5.0
Barium	0.073	0.001	100
Cadmium	ND	0.001	1.0
Chromium	0.001	0.001	5.0
Lead	ND	0.001	5.0
Mercury	ND	0.001	0.2
Selenium	ND	0.001	1.0
Silver	ND	0.001	5.0

ND - Parameter not detected at the stated detection limit.

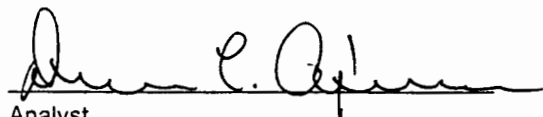
References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, December 1996.

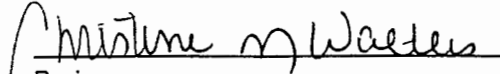
Methods 3010, 3020, Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, USEPA, December 1996.

Methods 6010B Analysis of Metals by Inductively Coupled Plasma-Atomic Emission SW-846, USEPA. December 1996.

Note: Regulatory Limits based on 40 CFR part 261 subpart C section 261.24, August 24, 1998.

Comments:


 Analyst


 Review

EPA METHOD 1311
TOXICITY CHARACTERISTIC
LEACHING PROCEDURE
TRACE METAL ANALYSIS
Quality Assurance Report

Client:	N/A	Project #:	N/A
Sample ID:	09-02-TCM QA/QC	Date Reported:	09-02-04
Laboratory Number:	30341	Date Sampled:	N/A
Sample Matrix:	TCLP Extract	Date Received:	N/A
Analysis Requested:	TCLP Metals	Date Analyzed:	09-02-04
Condition:	N/A	Date Extracted:	09-01-04

Blank & Duplicate Conc. (mg/L)	Instrument Blank	Method Blank	Detection Limit	Sample	Duplicate	% Difference	Acceptance Range
Arsenic	ND	ND	0.001	0.002	0.002	0.0%	0% - 30%
Barium	ND	ND	0.001	0.068	0.067	1.5%	0% - 30%
Cadmium	ND	ND	0.001	ND	ND	0.0%	0% - 30%
Chromium	ND	ND	0.001	0.001	0.001	0.0%	0% - 30%
Lead	ND	ND	0.001	ND	ND	0.0%	0% - 30%
Mercury	ND	ND	0.001	ND	ND	0.0%	0% - 30%
Selenium	ND	ND	0.001	ND	ND	0.0%	0% - 30%
Silver	ND	ND	0.001	ND	ND	0.0%	0% - 30%

Spike Conc. (mg/L)	Spike Added	Sample	Spiked Sample	Percent Recovery	Acceptance Range
Arsenic	0.500	0.002	0.502	100.0%	80% - 120%
Barium	0.500	0.068	0.566	99.6%	80% - 120%
Cadmium	0.500	ND	0.500	100.0%	80% - 120%
Chromium	0.500	0.001	0.501	100.0%	80% - 120%
Lead	0.500	ND	0.499	99.8%	80% - 120%
Mercury	0.050	ND	0.050	100.0%	80% - 120%
Selenium	0.500	ND	0.499	99.8%	80% - 120%
Silver	0.500	ND	0.499	99.8%	80% - 120%

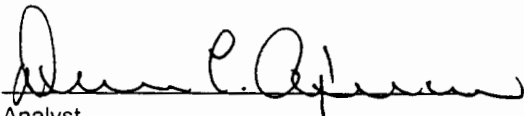
ND - Parameter not detected at the stated detection limit.

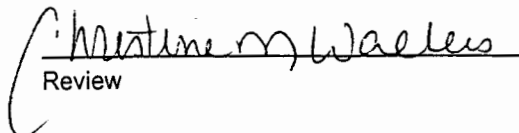
References: Method 1311, Toxicity Characteristic Leaching Procedure, SW-846, USEPA, Dec. 1996

Methods 3010, 3020, Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, USEPA, December 1996.

Methods 6010B Analysis of Metals by Inductively Coupled Plasma-Atomic Emission, SW-846, USEPA, December 1996.

Comments: QA/QC for sample 30341 - 30342.


Analyst


Review

FLASH POINT ANALYSIS

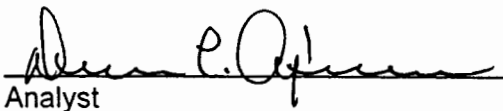
Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Hydroblast Comp.	Date Reported:	09-01-04
Lab ID#:	30341	Date Sampled:	08-31-04
Sample Matrix:	Soil	Date Received:	08-31-04
Preservative:	Cool	Date Analyzed:	09-01-04
Condition:	Cool & Intact	Chain of Custody:	12882

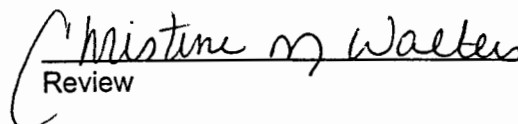
Parameter	Result
-----------	--------

FLASH POINT	> 350° C
-------------	----------

Reference: Method 1010, Pensky-Metrens Closed-Cup Method For Determining Flash Point.
SW846, USEPA September 1986.

Comments:


Analyst


Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

FLASH POINT ANALYSIS

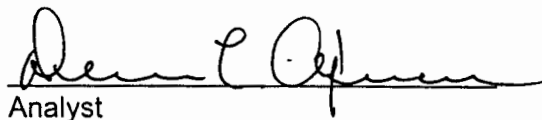
Client:	Giant Refinery	Project #:	96012-009
Sample ID:	Tank 36 Comp.	Date Reported:	09-01-04
Lab ID#:	30342	Date Sampled:	08-31-04
Sample Matrix:	Soil	Date Received:	08-31-04
Preservative:	Cool	Date Analyzed:	09-01-04
Condition:	Cool & Intact	Chain of Custody:	12882

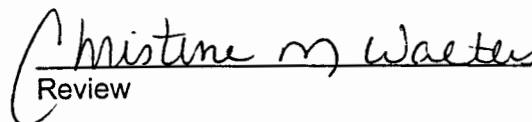
Parameter	Result
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FLASH POINT	> 350° C
-------------	----------

Reference: Method 1010, Pensky-Metrens Closed-Cup Method For Determining Flash Point.
SW846, USEPA September 1986.

Comments:


Analyst


Review

CHAIN OF CUSTODY RECORD

12882

Client / Project Name <i>Sicent Refinery</i>			Project Location <i>Tank 36</i>		ANALYSIS / PARAMETERS						
Sampler:			Client No. <i>96012-009</i>		No. of Containers <i>8015 TPA</i>	<i>PC1</i>	<i>TCLP Metals</i>	<i>BTOY</i>	<i>Flesh Pot</i>	Remarks	
Sample No./ Identification	Sample Date	Sample Time	Lab Number	Sample Matrix							
<i>Hydroblast Comp</i>	<i>8/31/04</i>	<i>14:15</i>	<i>30341</i>	<i>Soil</i>	1	✓	✓	✓	✓		
<i>Tank 36 Comp</i>	<i>8/31/04</i>	<i>14:00</i>	<i>30342</i>	<i>Soil</i>	1	✓	✓	✓	✓		

Relinquished by: (Signature) <i>[Signature]</i>	Date	Time	Received by: (Signature) <i>[Signature]</i>	Date	Time
	<i>8/31/04</i>	<i>14:40</i>		<i>8/31/04</i>	<i>14:40</i>
Relinquished by: (Signature)			Received by: (Signature)		
Relinquished by: (Signature)			Received by: (Signature)		

ENVIROTECH INC.

5796 U.S. Highway 64
Farmington, New Mexico 87401
(505) 632-0615

Sample Receipt			
	Y	N	N/A
Received Intact	✓		
Cool - Ice/Blue Ice	✓		

Hope Monzeglio

From: Price, Wayne [WPrice@state.nm.us]
Sent: Thursday, October 21, 2004 8:31 AM
To: 'Randy Schmaltz'; Price, Wayne
Cc: 'Hope Monzeglio'; Foust, Denny
Subject: RE: Soil Request

OCD hereby approves of your request with the following conditions:

1. One treatment zone soil sample shall be collected three feet below the approximate center of the temporary landfarm area before placement of any soils. The soil sample shall be analyzed for TPH, BTEX, and general chemistry.

2. On the general site plot plan mark this location and submit for our files.

Please be advised that NMOCD approval of this plan does not relieve (Giant) of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (Giant) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----

From: Randy Schmaltz [mailto:rschmaltz@giant.com]
Sent: Wednesday, October 20, 2004 4:48 PM
To: 'Wayne Price'
Cc: 'Hope Monzeglio'; 'Denny Foust'
Subject: Soil Request

<<Release N. MW #45 Soil Request.doc>>

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For more information please visit <http://www.messagelabs.com/email>

Mr. Wayne Price
New Mexico Oil Conservation Division
1220 South St. Frances Dr.
Santa Fe, New Mexico 87505

October 20, 2004

Re: **Request to Utilize Non-Hazardous Soil -Release North of MW #45**

Dear Mr. Price,

Giant Refining Company – Bloomfield Refinery requests permission for on-site utilization of the non-hazardous impacted soil removed from the release North of Monitoring Well #45. This soil will be placed in a low-lying area on the East end of the refinery property. An earthen berm will be constructed around this area to prevent storm water contamination.

Please find enclosed the analytical results from composite samples taken from this material:

1. Hydro Blast Pad Composite (1200 cubic yards)
 - BTEX – Non-hazardous for any chemical.
 - Benzene = .097 (mg/Kg)
 - Total BTEX= .722 (mg/Kg)
 - TCLP-

Arsenic	0.002 (mg/Kg)
Barium	0.068 (mg/Kg)
Cadmium	ND
Chromium	0.001 (mg/Kg)
Lead	ND
Mercury	ND
Selenium	ND
Silver	ND
 - TPH – 301 (mg/kg)
 - GRO = 57.2 (mg/Kg)
 - DRO = 244 (mg/Kg)
 - Ignitability – Negative
 - Corrosivity – Negative
 - Reactivity – Negative
 - PH = 7.43
 - Flash Point >350 C

GRCC



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 28, 2004

Mr. Randy Schmaltz
Environmental Supervisor
Giant Refining Company
P.O. Box 159
Bloomfield, NM 87413

Mr. Ed Riege
Environmental Superintendent
Giant Refining Company
Route 3 Box 7
Gallup, NM 87301

RE: NOTICE OF APPROVAL
SOIL DISPOSAL SAN JUAN COUNTY LANDFILL
GIANT REFINING COMPANY, BLOOMFIELD REFINERY
NMD089416416
HWB-GRCC-04-001

Dear Mr. Schmaltz and Mr. Riege:

The New Mexico Environment Department (NMED) has reviewed the attachments to your email dated October 27, 2004 titled Soil Disposal Request and Drummed Soil (MW-#45). The email documents a request for disposal of 16 barrels of impacted soil from the MW #45 release site at the San Juan County Landfill.

NMED hereby approves the soil disposal of impacted soil at the San Juan County Landfill. Giant Refining Company must fulfill the requirements specified by OCD in their October 27, 2004 email.

Hope Monzeglio

From: Hope Monzeglio [hope_monzeglio@nmenv.state.nm.us]
Sent: Wednesday, October 27, 2004 3:57 PM
To: Cindy Hurtado; Price, Wayne
Cc: Bob Wilkinson; Randy Schmaltz; Ed Riege; Denny Foust; David Cobrain
Subject: RE: Soil Disposal Request

NMED is in agreement with OCD, this email constitutes NMED's approval of Giant's request to dispose of hydrocarbon contaminated soil in the San Juan Co. Landfill. A follow up letter will follow.

Hope Monzeglio

-----Original Message-----

From: Price, Wayne
Sent: Wednesday, October 27, 2004 2:52 PM
To: 'Cindy Hurtado'; Price, Wayne; 'Hope Monzeglio'
Cc: Foust, Denny; 'Robert Wilkinson'; 'Dave Cobrain'; Randy Schmaltz; Ed Riege
Subject: RE: Soil Disposal Request

OCD hereby approves of Giant's request to dispose of hydrocarbon contaminated soil in the San Juan Co. Landfill with the following conditions:

1. The soil must be RCRA non-hazardous and NMED-haz waste must approve.
2. Giant shall provide proof of disposal, waste manifest, etc.
3. This approval is good for 30 days and only for soils generated during the emergency response approved by OCD.

Please be advised that NMOCD approval of this plan does not relieve (Giant) of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve (Giant) of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----

From: Cindy Hurtado [mailto:churtado@giant.com]
Sent: Wednesday, October 27, 2004 2:15 PM
To: 'Wayne Price'; 'Hope Monzeglio'
Cc: 'Denny Foust'; 'Robert Wilkinson'; 'Dave Cobrain'; Randy Schmaltz; Ed Riege
Subject: Soil Disposal Request

<<Soil Disposal Request.doc>> <<Drummed soil (MW #45).doc>>

This email has been scanned by the MessageLabs Email Security System.
For more information please visit <http://www.messagelabs.com/email>

Wayne Price
New Mexico Oil Conservation Division
1220 South St. Frances Dr.
Santa Fe, New Mexico 87505

Hope Monzeglio
New Mexico Environmental Department
Hazardous Waste Bureau
2905 Rodeo Park Dr. East
Bldg 1
Santa Fe, New Mexico 87505

October 26, 2004

Re: Request for Disposal of Impacted Soil

Dear Mr. Price and Ms. Monzeglio,

Giant Refining Company – Bloomfield Refinery requests for approval for final disposition of 16 barrels of impacted soil from the MW #45 Release to the San Juan County Landfill. The waste will be treated at the Landfill Facility to New Mexico State standards and directly disposed of at the San Juan County Landfill.

Enclosed, please find analytical data and Waste Management’s profile and approval. Hard copies for your records will follow.

Your prompt attention to this matter will be greatly appreciated. If you need more information, please contact me at (505) 632-4161.

Sincerely,

Cindy Hurtado
Environmental Assistant
Giant Refining Company – Bloomfield

Cc: Dave Cobrain, NMED
Robert Wilkinson, EPA
Denny Foust, New Mexico Oil Conservation Division – Aztec
Ed Riege



PO Box 15700
Rio Rancho, NM 87174

Monday, October 04, 2004

Giant Refinery
#50 Road 4990
P.O. Box 159
Bloomfield, NM 87413

To: Cindy Hirtado

Effective 10/4/04 the waste material on Profile # SIC 06765 B has been approved for disposal at WASTE MANAGEMENT INC. San Juan County Landfill pending the return and approval of account set up information. The waste material will be treated on site to acceptable New Mexico State standards and directly disposed of at the San Juan County Landfill. This approval is limited to the waste described on the profile # stated above and is valid until 4/4/05. The San Juan County Facility reserves the right to reject any shipment of waste that fails to conform with profile sheet information/documentation.

Sincerely,

Waste Management
Industrial Landfill Sales New Mexico

Mark Allen

A handwritten signature in black ink, appearing to read "Mark Allen". The signature is written in a cursive style with a large initial "M".

Division I
 1623 N. French Ln., Hobbs, NM 88240
 District II
 1301 W. Grand Avenue, Artesia, NM 88210
 District III
 1000 Rio Grande Road, Aztec, NM 87410
 District IV
 1220 E. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
 Energy Minerals and Natural Resources
 Oil Conservation Division
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

Form C-13A
 Revised June 10, 2003
 Submit Original
 Plus 1 Copy
 to Appropriate
 District Office

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

1. RCRA Except: <input type="checkbox"/> Non-Except: <input checked="" type="checkbox"/> Verbal Approval Received: Yes <input type="checkbox"/> No <input type="checkbox"/>	4. Generator GIANT Refining Company
2. Management Facility Destination San Juan County Regional Landfill	5. Originating Site GIANT Refinery-Bloomfield
3. Address of Facility Operator #78 CR 3140 Aztec, NM 87410	6. Transporter Waste Management
7. Location of Material (Street Address or ULSR) #49 CR 4990 Bloomfield, NM 87413	8. State New Mexico
9. <u>Circle One:</u> A. All requests for approval to accept off-site except wastes will be accompanied by a certification of waste from the Generator, one certificate per job. B. All requests for approval to accept non-except wastes must be accompanied by necessary chemical analysis to PROVE the material is non-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved. All transporters must certify the wastes delivered are only those consigned for transport.	

BRIEF DESCRIPTION OF MATERIAL:

Petroleum Impacted Soil

Must have OCS approval letter before transporting and disposal at San Juan County Landfill.

*J. Hammer
 10/26/04*

Estimated Volume 6 or Known Volume (to be entered by the operator at the end of the haul) _____ or

SIGNATURE J. Hammer TITLE: District Mgr DATE: 10/26/04
Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: John Hammer TELEPHONE NO. 505 334 1121

E-MAIL ADDRESS Jhammer@wm.com

(This space for State Use)

APPROVED BY: _____ TITLE: _____ DATE: _____

APPROVED BY: _____ TITLE: _____ DATE: _____

ENVIROTECH LABS

PRactical SOLUTIONS FOR A BETTER TOMORROW

CATION / ANION ANALYSIS

Item:	Grant	Project #:	88012-028
Sample ID	001	Date Reported:	08-19-04
Job Order Number	30057	Date Sampled:	08-14-04
Location/County	12735	Date Received:	08-14-04
Sample Matrix	Soil Extract	Date Extracted:	08-17-04
Preservative	Cool	Date Analyzed:	08-18-04
Condition:	Cool & Intact		

Parameter	Analytical		Units	Units
	Result	Units		
PH	6.00	su		
Conductivity @ 25° C	267	umhos/cm		
Total Dissolved Solids @ 180C	236	mg/L		
Total Dissolved Solids (Calc)	218	mg/L		
SAR	1.8	ratio		
Total Alkalinity as CaCO3	53.6	mg/L		
Total Hardness as CaCO3	68.0	mg/L		
Bicarbonate as HCO3	63.6	mg/L	0.63	meq/L
Carbonate as CO3	<0.1	mg/L	0.00	meq/L
Hydroxide as OH	<0.1	mg/L	0.00	meq/L
Nitrate Nitrogen	1.7	mg/L	0.03	meq/L
Nitrite Nitrogen	0.025	mg/L	0.00	meq/L
Chloride	28.8	mg/L	0.81	meq/L
Fluoride	0.27	mg/L	0.01	meq/L
Phosphate	0.3	mg/L	0.26	meq/L
Sulfate	74.0	mg/L	1.54	meq/L
Iron	0.250	mg/L	0.01	meq/L
Calcium	25.6	mg/L	1.28	meq/L
Magnesium	5.86	mg/L	0.48	meq/L
Potassium	2.08	mg/L	0.05	meq/L
Sodium	19.0	mg/L	1.70	meq/L
Cations			3.52	meq/L
Anions			3.54	meq/L
Cation/Anion Difference			0.48%	

Reference: U.S.E.P.A. 800/4-79-030, "Methods for Chemical Analysis of Water and Wastes", 1983
 Water and Waste Water, 18th ed., 1980

Comments: Outfall Area Top of Spill.

Christine M. Walters
 Analyst

A. C. O.
 Review

ENVIROTECH LABS

PRACTICAL SOLUTIONS FOR A BETTER TOMORROW

EPA METHOD 8015 Modified Nonhalogenated Volatile Organics Total Petroleum Hydrocarbons

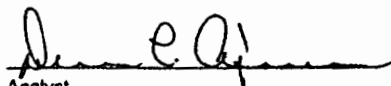
Client:	Giant	Project #:	96012-028
Sample ID:	001	Date Reported:	08-18-04
Laboratory Number:	30030	Date Sampled:	08-13-04
Chain of Custody No:	12752	Date Received:	08-13-04
Sample Matrix:	Soil	Date Extracted:	08-16-04
Preservative:	Cool	Date Analyzed:	08-18-04
Condition:	Cool and Intact	Analysis Requested:	8015 TPH

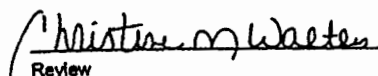
Parameter	Concentration (mg/Kg)	Det. Limit (mg/Kg)
Gasoline Range (C5 - C10)	3,880	0.2
Diesel Range (C10 - C28)	5,400	0.1
Total Petroleum Hydrocarbons	9,280	0.2

ND - Parameter not detected at the stated detection limit.

References: Method 8015B, Nonhalogenated Volatile Organics, Test Methods for Evaluating Solid Waste, SW-846, USEPA, December 1996.

Comments: Outfall Area Top of Spill.


Analyst


Review