

GRCB OS

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GIANT

REFINING COMPANY

CERTIFIED MAIL # 7099 3220 0010 2242 4832

January 19, 2005

Ms. Hope Monzeglio
State of New Mexico Environmental Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303



Re: Giant Bloomfield Refinery – Request for Supplemental Information
Ground Water Remediation and Monitoring Annual Report April 2004
EPA ID NO. NMD 089416416
HWB-GRCB-04-001

Dear Ms. Monzeglio:

Giant Refining Company Bloomfield (GRCB) received the November 17, 2004 letter from the New Mexico Environmental Department (NMED) concerning NMED's technical adequacy review of Bloomfield's Ground Water Remediation and Monitoring Annual Report submitted April 2004. NMED requested additional information and provided requirements for future ground water reports. The purpose of this letter is to provide NMED with the requested additional information.

General Comments

Giant will endeavor to improve the annual report and will follow the HWB's position paper "General Reporting Requirements For Routine Groundwater Monitoring at RCRA Sites" when preparing future reports.

Specific Comments

1. Giant will collect monthly effluent samples from the outfall discharge to the raw water ponds and analyze the effluent sample for BTEX using EPA method 8021B. After four months of sampling and no exceedance of the WQCC levels, the sampling frequency will be reduced to quarterly.

In addition Giant is currently conducting a carbon filter pilot test and will share the results with NMED upon completion of the test.

PHONE
505-632-8013
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505-632-3911

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

2. Monitoring well # 36 was not sampled. Giant has implemented a compliance calendar to insure this omission does not happen in the future.
3. It has been determined that Monitoring Well # 24 was constructed during the time in which Gary-Williams Energy owned and operated the refinery. The design of the well was for air sparging activities, and does not accommodate sampling due to its construction.

Upon completion of the Barrier wall project, an NMED-OCD approved monitoring point will be constructed.

4. Attachment A presents revised installation diagrams for MW #45 and MW #47 indicating the depth of the water table. MW #45 ground water elevation is at 5479.79 and MW #47 ground water elevation is at 5479.14.
5. MW #45 was developed by pumping out five borehole volumes of water (approximately 16 gallons) at an estimated rate of 0.5 gallons per minute. The water quality parameter condition listed in Attachment A "Requirements for Long-Term Ground Water Monitoring, Corrective Measure Study and Implementation (CMS/CMI) (Discharge Plan-Abatement Plan) was issued on January 6, 2003. MW #45 was drilled on January 15, 2003. Giant did not have ample time to acquire essential equipment for field measuring water quality parameters.

MW #47 was developed by baling out five borehole volumes of water (calculated to 1.19 gallons) over a thirty minute period. That calculates to a 0.039 gallons/minute removal rate. Water quality parameters are as follows:

pH	EC	Temp (F)
6.60	3670	54
6.68	3690	53
6.68	3570	53

6. Giant will abide by NMED's request.
7. MW #1 and RW # 1 are two separate wells. The Executive Summary states that Recovery well (RW #1) was reactivated in August 2003.

MW #1 and MW #9 were both measured and sampled during the annual sampling event. MW #9 was converted into a Recovery Well in November 2003.

Giant has implemented a policy of taking plant wide groundwater measurements during semi-annual and annual sampling events.

8. Giant provides a letter from the third party lab Hall Environmental Analysis Laboratory (attachment B) as the explanation for using EPA Method 6010C instead of EPA Methods 7191 and 7421.

Ms. Hope Monzeglio
January 17, 2005

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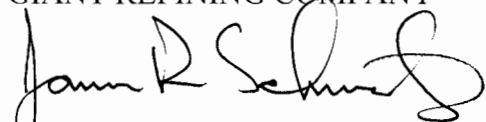
Giant requests approval for the use of EPA method 6010C instead of EPA methods 7191 and 7421 based on the information provided in (attachment B).

9. Giant will submit future reports to NMOCD Santa Fe office, NMOCD Aztec District office, NMED Hazardous Waste Bureau, and to the EPA by April 15 of each respective year.
10. Giant will ensure the Annual Report presents the information requested.

If you have any questions regarding this submittal, please contact me at 505-632-4171.

Sincerely,

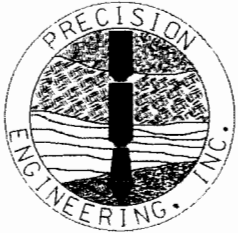
GIANT REFINING COMPANY



James R. Schmaltz
Environmental Manager

Cc: Wayne Price - OCD
Denny Foust - OCD Aztec Office
Bob Wilkinson - EPA
Ed Riege
Chad King

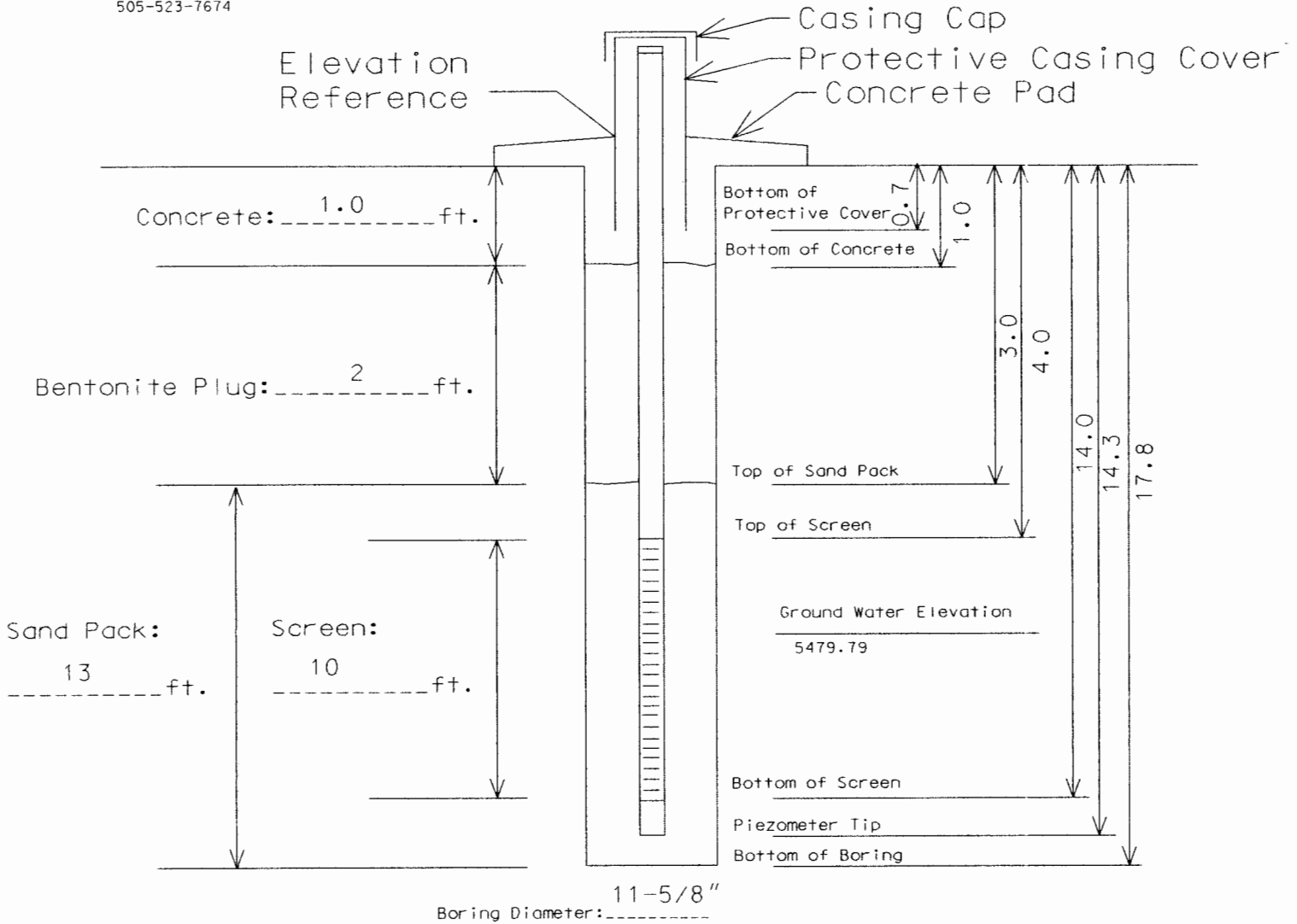
Attachment A



505-523-7674

Installation Diagram

Monitoring Well No. MW - 45



Boring Diameter: 11-5/8"

Sand Type: 10-20 Silica

Bollards, Type/Size: Steel, 3" min.

Bentonite: 3/8" Chip

Screen Type/Size: 4" PVC Sch. 40, 0.010" Slotted

Cement/Grout: _____

Riser Type/Size: 4" PVC Sch. 40

Water: Potable

Locking Expandable Casing Plug? Yes

Site Northing: 5790.85

Other: N/A

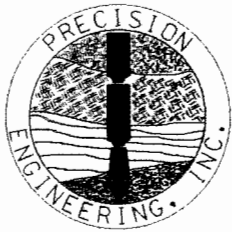
Bottom Cap Used? _____

Site Easting: 2837.78

Project #: 03-015

Project Name: Bloomfield Wells

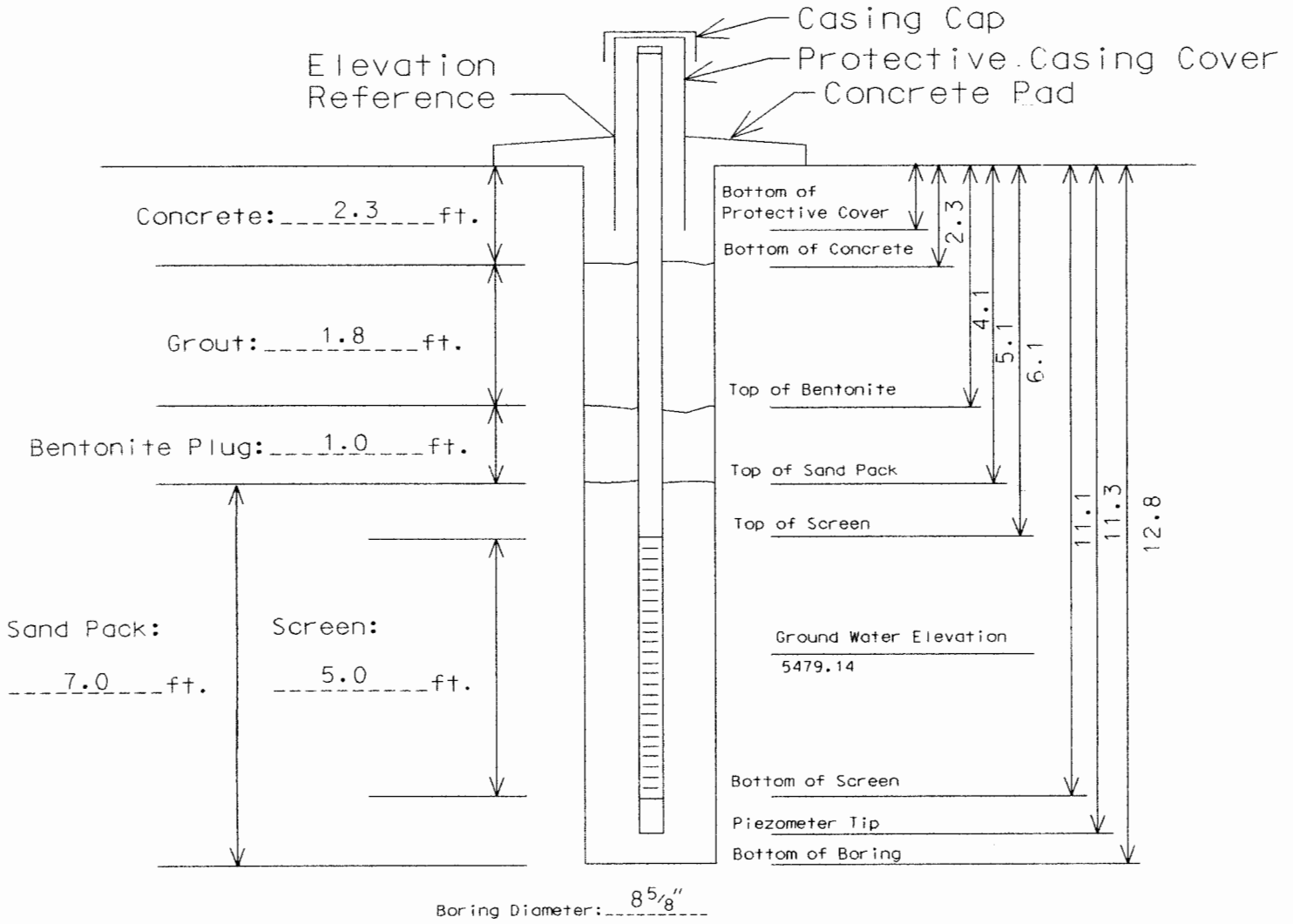
Elevation: 5489.33



505-523-7674

Installation Diagram

Monitoring Well No. MW-47 (Seep 5)



Boring Diameter: 8⁵/₈"

Sand Type: 10-20 Silica

Ballards. Type/Size: Steel, 3"

Bentonite: 3/8" Chips

Screen Type/Size: 2" PVC Sch. 40, 0.010" Slotted

Cement/Grout: 6% Bentonite

Riser Type/Size: 2" PVC Sch. 40

Water: Potable

Locking Expandable Casing Plug? Yes

Site Northing: 5413.57

Other: N/A

Bottom Cap Used? Yes

Site Easting: 2220.90

Project #: 03-015

Project Name: Giant Refining Co. Bloomfield Wells

Elevation: 5486.63

Attachment B



**Hall Environmental
Analysis Laboratory, Inc.**

November 22, 2004

Cindy Hurtado
San Juan Refinery
#50 CR 4990
Bloomfield NM, 87413

RE: EPA Method 6010C vs. Graphite Furnace methods

Dear Ms. Cindy Hurtado,

Hall Environmental Analysis Laboratory uses EPA Method 6010 for metals analysis instead of the EPA 7000 series methods. This method is EPA approved and has been adopted by virtually all commercial laboratories. In fact, most commercial laboratories including Hall Environmental do not have the old equipment to perform the 7000 series methods.

Should you have any further questions regarding this matter, please feel free to call me at 505-345-3975.

Sincerely,

Andy Freeman
Business/Project Manager