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State of New Mexico  
ENVIRONMENT DEPARTMENT

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GRCB 05



ENTERED

RON CURRY  
SECRETARY

DERRITH WATCHMAN-MOORE  
DEPUTY SECRETARY

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

July 28, 2005

Randy Schmaltz  
Environmental Supervisor  
Giant Refining Company  
P.O. Box 159  
Bloomfield, New Mexico 87413

Ed Riege  
Environmental Superintendent  
Giant Refining Company  
Route 3, Box 7  
Gallup, New Mexico 87301

**Subject: SUPPLEMENTAL INFORMATION REQUEST AMENDMENTS TO THE  
REMEDICATION SYSTEM RIVER TERRACE VOLUNTARY  
CORRECTIVE MEASURES WORK PLAN.  
GIANT REFINING COMPANY, BLOOMFIELD REFINERY  
RCRA PERMIT NO. NMDD 089416416  
HWB-GRCB-05-002**

Dear Messrs. Schmaltz and Riege:

The New Mexico Environment Department (NMED) is requiring Giant Refining Company, Bloomfield Refinery (GRCB) to submit additional information in the revised version of the July 15, 2005 *River Terrace Voluntary Corrective Measures Work Plan* (VCM Work Plan) addressing the implementation and monitoring of the remediation system at the River Terrace Sheet Pile Area. The additional information must be attached as an appendix to the revision of the document cited above. The appendix must address the information listed below.

1. GRCB must include a list of the parameters that will be used to demonstrate the bioventing remediation system is operating correctly and is effectively remediating the river terrace area.

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2. GRCB must describe in detail how the remediation system will be monitored. GRCB must also identify the parameters that will be monitored to demonstrate the occurrence of natural attenuation processes at the site.
3. Prior to the system startup, NMED is requiring GRCB to collect baseline measurements to include but is not limited to the following:
  - a) measure depth to water (DTW) and depth to product (DTP) levels in all temporary wells, monitoring wells, recovery wells and bioventing wells,
  - b) percent oxygen, percent carbon dioxide, and organic vapor measurements in the vadose zone from all temporary wells, monitoring wells, and bioventing wells. Organic vapors must be measured using a photo ionization detector (PID) equipped with a 10.6 or higher electron volt (eV) lamp or a combustible gas indicator (CGI). Vadose zone vapor samples shall be collected from approximately one foot above the water table by inserting a tube into the well and inserting the PID or CGI probe into the other end of the tubing. To determine the tubing length, a depth to water measurement must be obtained from the wells and the tubing shall be inserted to a depth of one foot above the measured depth to water. The tubing size shall accommodate the size of the probe eliminating the entry of ambient air. Giant should use caution when collecting the vapor reading to ensure water is not pulled into the tubing.
  - c) dissolved oxygen (DO), pH, electrical conductivity, temperature, carbon dioxide, and oxidation reduction potential (ORP) values in all temporary, monitoring, and bioventing wells.
4. GRCB must provide a description of methods and instruments used to collect samples and measure field parameters.
5. GRCB must include a schedule and frequency of all monitoring activities planned for this area.

The appendix must be submitted to NMED on or before September 12, 2005. Upon final approval of the July 15, 2005 amendment to the VCM work plan, any modifications or changes must be submitted in writing to NMED within thirty (30) days of implementation.

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Should you have any questions regarding this letter, please call me at 505-428-2545.

Sincerely,



Hope Monzeglio  
Project Leader  
Hazardous Waste Bureau

HM:hcm

cc: D. Cobrain, NMED HWB  
W. Price, OCD  
D. Foust, OCD Aztec Office  
B. Wilkinson, EPA

Reading File and GRCB 2005 File