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ENTERED



RON CURRY
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DEPUTY SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

November 1, 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: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND CHANGES TO THE NORTH BOUNDARY BARRIER COLLECTION SYSTEM DESIGN AND MONITORING PLAN PHASE II GIANT REFINING COMPANY, BLOOMFIELD REFINERY RCRA PERMIT NO. NMDD 089416416 HWB-GRCB-04-005

Dear Messrs. Schmaltz and Riege:

The New Mexico Environment Department (NMED) is in receipt of the September 19, 2005 document submitted on behalf of Giant Refining Company, Bloomfield Refinery (GRCB) regarding the *Request for Additional Information and Changes to the North Boundary Barrier Collection System Design and Monitoring Plan Phase II*. The following comments address the additional information presented in the September 19, 2005 document. GRCB must adhere to the following requirements:

1. In reference to comment No. 3 of the 9/19/05 letter addressing dissolved oxygen (DO): based on the information provided, the Hach High Range Dissolved Oxygen Accuvac Ampul method provides high measurement readings resulting from interference. The skewed results may also be a consequence of improper method application. The method is intended for aquaculture use and not groundwater testing. NMED is requiring GRCB to find an alternate instrument that accurately measures DO in groundwater samples.

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NMED recommends utilizing a down hole instrument with an application that applies to groundwater. NMED can recommend alternate instruments upon request.


2. GRCB must submit a System Start-up Six-Month Report that includes all data gathered from the observation and collection wells for the first 6 months after the barrier installation (May 2005 through October 2005). The tables submitted in the June 17, 2005 and July 15, 2005 letters can be utilized but must be revised to include the following:
 - Add a "Measuring Point Elevation" column that indicates the elevation from which GRCB measures the depth to water (DTW) and depth to product (DTP) (i.e the surveyed well casing elevation),
 - Add a "Corrected Groundwater Elevation" column,
 - Footnotes providing the calculation to determine the corrected groundwater elevations if separate phase hydrocarbon (SPH) is present. The footnotes must also include any other calculations that were used in generating the data tables,
 - The tables must apply an acronym to each separate cell of a row or column for the wells not sampled due to the presence of (SPH); the well was dry, or other reason a well was not sampled (e.g. not analyzed (NA); not sampled (NS), dry, contains SPH (SPH)). The acronym must be defined at the bottom of a table in a key or as a footnote, and
 - Provide a divider that separates the data for each month. Include a section that addresses fluids recovered from the observation and collection wells and the frequency of fluids removal.
3. GRCB must also submit an Annual System Monitoring Report that summarizes the previous years monitoring data (May 2005 through April 2006). The Annual Report must adhere to the requirements established in comment No. 2, in addition to the following:
 - All groundwater sampling data for the observation and collection wells that has occurred to date (e.g. the initial groundwater sampling results and the results from the groundwater monitoring event as addressed in the May 9, 2005 letter, and any other sampling that occurs before April 2006). The data presented in tables must incorporate the month the sampling data was collected (e.g. June 17, 2005 letter), and
 - An appendix that includes all the analytical laboratory results. The laboratory results must be separated by month.

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4. Tables in the June 17, 2005 letter indicate wells not sampled due to the presence of hydrocarbons. Be aware the presence of hydrocarbons is unknown until the laboratory analyzes the sample; however, a well may not be sampled due to the presence of SPH. GRCB must revise the tables titled *PHASE II Monitoring – 2005 General Chemistry – Observation Wells*, *PHASE II Monitoring – 2005 General Chemistry – Collection Wells*, *PHASE II Monitoring – 2005 BTEX & Total Metals – Observation Wells*, *PHASE II Monitoring – 2005 BTEX & Total Metals – Collection Wells* included in the June 17, 2005 letter in accordance with applicable bullets in comments No. 2 and 3.

The System Start-up Six-Month Report must be submitted to NMED on or before December 31, 2005. The Annual System Monitoring Report must be submitted on or before June 30, 2006. Should you have any questions regarding this letter, please call me at 505-428-2545.

Sincerely,



Hope Monzeglio
Project Leader
Hazardous Waste Bureau

HM

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

* Denotes electronic copy
Reading File and GRCB 2005 File