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**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

February 21, 2006

Ed Riege
Environmental Superintendent
Giant Ciniza Refining Company
Route 3 Box 71
Gallup, New Mexcio 87301

**SUBJECT: RESPONSE TO APPROVAL WITH MODIFICATIONS TO THE 2003
OCD ANNUAL REPORT GW-32 RESPONSE LETTER
GIANT REFINING COMPANY, CINIZA REFINERY
EPA ID NO. NMD000333211
HWB-GRCC-04-001**

Dear Mr. Riege:

The New Mexico Environment Department has completed its review of the document titled *Response Letter, HWB-GRCC-04-001* to the 2003 OCD Annual Report GW-32 dated September 26, 2005 submitted on behalf of Giant Refining Company, Ciniza Refinery (the Permittee). The Permittee must address all requirements and revisions identified in the comments below and apply them to future groundwater monitoring reports.

1. Response letter, Comment # 12 states, "[t]his page was revised, see (Attachment 8). The term low was deleted and the reference to OCD wells (mistake) was changed to OW. The request to sample OW 14 on a semiannual basis was added to Section 9 of the renewal application."

NMED Comment: It appears the sampling of well OW-14 on a semi annual basis was not changed in the table provided in Section 9, No. 4. The Permittee must revise the table under the Frequency Column for Well OW-14 to semi-annual.

Mr. Ed Riege
Giant Ciniza Refining Company
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2. Comment # 20 states *"In 2003 product recovered from RW-1 was 17.3 gallons, RW-5 was 3,250 mls of product, and RW-6 had 9,050 ml of product recovered. Giant Personnel measured the volume....."*

NMED Comment: The next groundwater report must be consistent when reporting the units for the volume of product measured. If the Permittee uses an abbreviation such as ml or mls, the abbreviation must also be defined. The Permittee must report the volume of product in gallons.

3. Attachment 1, which contains the revisions to the *OCD Discharge Plan Renewal Application*, the first block of the last row in the Table in Section 9.0, page 9-4 is empty and must be revised to include the Northeast OCD Landfarm. The Permittee shall refer to the email dated December 6, 2005 from Ed Riege to Hope Monzeglio titled *"Groundwater Plan in the discharge permit."*

Please call me at 505-428-2545 if have questions regarding this letter.

Sincerely,



Hope Monzeglio
Project Leader
Hazardous Waste Bureau

HM

cc: *D. Cobrain, NMED HWB
W. Price, OCD
C. Chavez, OCD
D. Foust, OCD Aztec Office
S. Morris, GRCC
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