



BILL RICHARDSON
GOVERNOR

GRCB
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



ENTERED



RON CURRY
SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 12, 2006

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: APPROVAL WITH CONDITIONS
SYSTEM START-UP SIX MONTH REPORT OF THE NORTH
BOUNDARY BARRIER COLLECTION SYSTEM PHASE II (MAY 2005
THROUGH OCTOBER 2005)
RCRA PERMIT NO. NMD 089416416
HWB-GRCB-06-002

Dear Messrs. Schmaltz and Riege:

The New Mexico Environment Department (NMED) has completed its review of the *System Start-Up North Boundary Barrier Collection System Phase II (May 2005 Through October 2005)* (Report) dated January 5, 2006, submitted on behalf of Giant Refining Company Bloomfield Refinery (GRCB). NMED hereby approves the Report with the conditions listed below. All conditions listed below must be addressed in a response letter or included in the Annual System Monitoring Report (Annual Report). If a response letter is submitted, the letter is due to NMED no later than May 12, 2006. The Annual Monitoring Report is due on or before June 30, 2006.

1. All automated and manual extraction of separate phase hydrocarbons (SPH) and water from recovery wells, observation wells, and collection wells shall be discontinued for 48 hours prior to the measurement of water and product levels.

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2. GRCB must identify in a response letter if the well end cap located at the bottom of MW-46 contains an opening that allows for the release of fluids that collect in the well casing below the screened interval.
3. [The Report, Section 5-4 Groundwater Elevation Information, August 2005 table, observation well OW0+60, Date column for row 8/23/05]. The Total Well Depth denotes 14.98 feet and the Depth to Water (DTW) is reported as 15.2 feet. It appears there may be a typographical error as the depth to water measurement is deeper than the depth of the well measurement. GRCB must provide NMED with an explanation for this discrepancy in a response letter or provide a corrected table.
4. [The Report, Section 5-1 Groundwater Elevation Information, May 2005 table, collection well CW3+85, the Depth to Product column contains "0" (zeros)]. The "0" also appears in Section 5-3 Groundwater Elevation Information, July 2005 table, collection well CW 23+90. The "0" must be defined via a footnote or an alternate acronym such as "not detected" or "not present." This must be revised in the Annual Report.

Note: no product measured (NPM) and no water measured (NWM) could be interpreted as "no attempt was made to measure depth to product or depth to water in a well, which does not mean, "not present."

5. The Report, Section 9 Maps: NMED requests that an 11"x17" map, as well as the figure submitted in the Report, be provided in the Annual Report.
6. GRCB shall also include a year when referencing a month or date (e.g. In the Report, Section 8 Summary states "...[g]iant personnel collected initial and annual groundwater samples from all Observation and Collection Wells that do not contain separate phase hydrocarbons in May and in August."). Years must be included in the Annual Report.
7. GRCB must include a brief description of instrument calibration in the Field Methods Section of the Annual Report. This should include how the instrument was calibrated and the type of calibration standard used, etc.
8. The Annual Report must include the installation diagrams and drilling/boring logs for all collection wells.

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9. GRCB must continue to sample all observation and collection wells located along the perimeter of the barrier wall during scheduled groundwater monitoring events. Observation and Collection wells containing SPH do not need to be sampled. All analytical information must be included in the Annual Report.

Please contact me with any questions regarding this letter at (505)-428-2545.

Sincerely,



Hope Monzeglio
Project Leader
Hazardous Waste Bureau

HM

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

Reading File and GRCB 2006 File