

GRCB Op



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RON CURRY
SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 12, 2006

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

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

**RE: APPROVAL WITH MODIFICATIONS
INTERIM MEASURES IMPLEMENTATION REPORT
NORTH BOUNDARY BARRIER AND COLLECTION SYSTEM
GIANT REFINING COMPANY, BLOOMFIELD REFINERY
EPA ID # NMD089416416 HWB-GRCB-05-004**

Dear Messrs. Schmaltz and Riege:

The New Mexico Environment Department (NMED) has completed its review of the *Interim Measures Implementation Report, North Boundary Barrier and Collection System* (Report), dated June 2006, submitted on behalf of Giant Refining Company, Bloomfield Refinery (GRCB). NMED hereby approves the Report, but requires GRCB to respond to the comments below and include the following elements in future reports.

Comment 1

GRCB states in Section 3.5.2 (Groundwater Sampling) of the Report "[i]n response to a written request submitted to Giant by (Oil Conservation Division) OCD dated May 9th, 2005, baseline groundwater samples were collected during the week of June 10, 2005 from the collection and observation wells where fluids had been detected." The samples were analyzed for volatile organic compounds (VOCs) by Environmental Protection Agency (EPA) Method 8021B, dissolved metals by EPA Method 6010C, mercury by EPA Method 7470, and anions (sulfate) by EPA Method 300.0. A summary of laboratory analytical results are provided in Table 5 and a

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copy of analytical reports are provided in Appendix I.

There are some discrepancies with the above statements. Table 5 does not provide analytical results for VOCs, dissolved metals and mercury and the sampling date references May 2005, not June 2005. In addition, the laboratory results included in Appendix I are dated May 10, 11, and 12, 2005 and do not reference the June sampling date.

GRCB does not need to submit any replacement pages but must provide an explanation for the discrepancies addressed above. Future reports providing tables that summarize analytical data (e.g. Table 5) must contain all detections. The table must include a row that identifies the Water Quality Commission Control Standard (WQCC) values for each of the detected constituents. Any constituents detected above the WQCC standard must be highlighted.

Comment 2

Table 1 (Summary of Trench Spoils Analytical Results) of the Report compared diesel range organics (DRO) detected at the site to diesel #2/crankcase oil for the industrial direct exposure of 1120 mg/kg of the New Mexico Environment Department's TPH Screening guidelines, November 2005. The DRO detected along the barrier wall cannot be specifically connected to "diesel #2/crankcase oil," only. The results should have been compared to the industrial cleanup level for "unknown oil" of 200 mg/kg. Future reports must compare DRO results to "unknown oil" if the specific hydrocarbon type is unknown. The "diesel #2/crankcase oil" guideline should only be applied when the contamination is known to consist of only that type of diesel.

Comment 3

GRCB states in Section 2.5 (Trench Spoils Segregation and Testing) of the Report that "[a] portion of the excavated soil from the trench was utilized for barrier construction and for backfill purposes. Excess excavated material (i.e., spoils mixed with bentonite) was transported to the refinery site. The majority of the spoils were stock-piled in the former storm water retention basins, located in the northwest portion of the refinery. Visually hydrocarbon-stained soil excavated from the trench was segregated and stock-piled in a separate location on the refinery site for subsequent management."

GRCB must identify the stock-pile location of the segregated "visually hydrocarbon-stained soil" and explain how it was managed subsequent to the completion of the barrier wall.

Comment 4

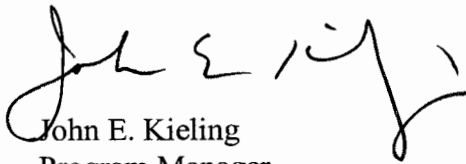
Future reports must apply the most current New Mexico Soil Screening Levels (NM SSL's). The most recent version of NMED's SSL's can be found on NMED's website:

<http://www.nmenv.state.nm.us/hwb/guidance.html>.

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GRCB must respond to this letter by December 30, 2006. If you have any questions regarding this letter, please contact Hope Monzeglio of my staff at (505) 428-2545.

Sincerely,



John E. Kieling
Program Manager
Permits Management Program
Hazardous Waste Bureau

JEK:hm

cc: D. Cobrain, NMED HWB
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