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ENVIRONMENT DEPARTMENT



ENTERED



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CERTIFIED MAIL -RETURN RECEIPT REQUESTED

November 2, 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

**RE: APPROVAL
NORTH BOUNDARY BARRIER COLLECTION SYSTEM PHASE II ANNUAL
REPORT MAY 2005 TO MAY 2006; HWB-GRCB-06-004
RCRA PERMIT NO. NMD 089416416**

Dear Messrs. Schmaltz and Riege:

The New Mexico Environment Department (NMED) has completed its review of the *North Boundary Barrier Collection System Phase II Annual Report May 2005 to May 2006* (Report), dated June 28, 2006 and submitted on behalf of Giant Refining Company, Bloomfield Refinery (GRCB). NMED hereby approves the Report. GRCB must provide a written response to this letter no later than January 8, 2006.

Comment 1

Section 5.2 (Observation Well Fluids Monitoring, October 2005), page 1, GRCB applies the acronyms NPP for No Product Present and NWP for No Water Present. The table provided on page 3 (Collection Well Fluids Monitoring October 2005) contains the acronyms NPM for No Product Measured and NWM for No Water Measured. For consistency, the tables should contain the same acronyms. This also appears in the Section 5.5 tables. Revised tables do not need to be submitted to NMED; however, Sections 5.2, 5.5, and the acronym notations must be revised for use in future reports.

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Comment 2

Section 6.10 (Sump Wells Baseline analysis) shows the March 2006 groundwater analytical data. The highlighted data represents detections above the New Mexico Water Quality Control Commission (WQCC) standards and the Environmental Protection Agency Maximum Contaminant Levels (MCL). Some constituents were detected at or above these standards but were not highlighted. (e.g., SW4-0206 detection for lead was at the MCL and not highlighted). GRCB does not need to revise the table, but these corrections must be included in future reports.

GRCB must also refer to the *New Mexico Environment Department TPH Screening Guidelines*, dated November 2005 and apply the guidelines to diesel range organics (DRO) contaminated media (Table 2a). The DRO guideline must be applied to future reports.

Comment 3

Section 6-11 (Phase II Monitoring -2005/2006) tables contain water quality data for the collection, observation, and monitoring wells. The tables presenting the collection and observation well data identify the sampling dates as Apr-06, Aug-05, and May-05. The tables containing the monitoring well data identify the sampling dates as Apr-06, Aug-05, and Apr-05. GRCB must clarify why the third sampling date for the collection and observation wells is different from the monitoring wells date. GRCB must provide replacement pages if corrections are made.

Comment 4

GRCB must check the conversions of parts per billion (ppb) to parts per million (ppm). Section 6.1 contains information regarding the April 2006 sample CW 23 + 10 that included a xylene concentration of 1.1 parts per million. The laboratory report contained in Section 13.15 for the same sample (CW-23+10) listed a detected xylene concentration of 110 ppb. The conversion of 110 ppb should be 0.110 ppm instead of 1.1 ppm, as shown in the table.

GRCB must submit replacement page(s) to correct the discrepancy.

Comment 5

GRCB must record the vacuum pressure on the vacuum truck used to remove groundwater and separate phase hydrocarbons (SPH) from the (collection, observation, and monitoring) wells. GRCB must also record the volume of total fluids recovered during the six month period and total volume removed for the year. This information must be provided in the six month report and the annual groundwater monitoring report. (See comment No. 7).

Comment 6

If GRCB observes any significant changes in the migration of groundwater and contaminants, either to new areas where hydrocarbons were not previously detected or if increasing concentrations are observed, NMED must be notified within two business days of discovery.

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Comment 7

GRCB must submit a six month monitoring report that summarizes the data gathered from May 2006 through October 2006. Instead of submitting another separate annual report, GRCB must include the annual reporting data (May 2006 to May 2007) for the north boundary barrier collection system into the annual groundwater monitoring report. This information can be included as an appendix to the annual groundwater monitoring report if desired.

The six month report is due to NMED no later than February 12, 2006. The annual barrier wall monitoring results must be incorporated into the annual groundwater monitoring report and submitted to NMED on or before April 15, 2007.

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

Sincerely,



Hope Monzeglio
Project Leader
Permits Management Program
Hazardous Waste Bureau

HM

cc: J. Kieling, NMED HWB
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File: Reading and GRCB 2006 File
HWB-GRCB-06-004