



BILL RICHARDSON
GOVERNOR

GRCB 07

State of New Mexico
ENVIRONMENT DEPARTMENT

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 13, 2007

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: DIRECTION TO MODIFY FUTURE MONITORING AS REPORTED IN THE RIVER TERRACE VOLUNTARY CORRECTIVE MEASURES-BIOVENTING SYSTEM ANNUAL REPORT JANUARY 2006 THROUGH DECEMBER 2006 GIANT REFINING COMPANY, BLOOMFIELD REFINERY
EPA ID# NMD000333211
HWB-GRCB-07-001**

Dear Mr. Schmaltz:

The New Mexico Environment Department (NMED) received Giant Refining Company's Bloomfield Refinery (GRCB) letter *River Terrace Voluntary Corrective Measures-Bioventing System Annual Report (January 2006 through December 2006)* (Report), dated May 18, 2007. Below are NMED's responses to the letter. The numbers below correspond to the numbers identified in the May 18, 2007 letter.

1. NMED requires the additional analysis of lead, chromium and barium for samples collected at the Temporary Wells (TP), MW-49 and DW-1 on a quarterly and annual basis because: 1) the baseline sampling in January 2006 detected lead in TP wells with lead detections exceeding the EPA maximum contaminant level (MCL); 2) the January 2006 baseline sampling results detected barium in every temporary well with one sample exceeding the Water Quality Control Commission (WQCC) standard of 1.0 mg/l and the MCL of 2.0 mg/l; and 3) chromium was also detected in some of the temporary wells during the January 2006 baseline sampling. Chromium and lead were used in refinery operations in the past, while barium is present in many wells throughout the refinery as

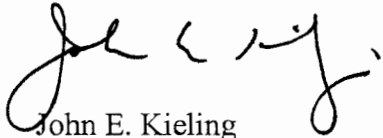
well as in the TP wells. There is limited data on all of these constituents at the River Terrace. These constituents must be tracked in order to identify any trends in concentrations of these metals. GRCB must compare detected contaminant concentrations with either the WQCC standard or the MCLs, whichever is lower. In this case, GRCB must apply the WQCC standards for barium and chromium of 1.0 mg/l and 0.05 mg/l, respectively as these are lower than the MCLs.

2. After the "2007 Second Quarter" sampling event, if well TP-7 does not yield sufficient amounts of water, NMED will consider a replacement location for TP-7.
3. GRCB shall collect injection pressure and injection flow rates from all bioventing wells in which air is being injected. NMED has revised Table 2 to reflect the sampling changes.
4. NMED has revised the footnote in Table 2 to reflect the 2007 in-situ respiration test as outlined in the May 18, 2006 letter from GRCB to NMED. Since the flow rates of the San Juan River are anticipated to be higher during the summer months of May 2007 than those of May 2006, GRCB must contact the Bureau of Reclamation and obtain the flow rates for the river at the time of the in-situ respiration test in 2007 and for May 2006 for comparison purposes. This information must be provided in the annual report.

Randy Schmaltz
June 13, 2007
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A revised Table 2 is attached with this letter containing the changes identified in Comments 3 and 4. If you have any questions regarding this letter, please contact Hope Monzeglio at (505) 476-6045.

Sincerely,



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

JEK:hm

cc: D. Cobrain, NMED HWB
C. Frischkorn, NMED HWB
H. Monzeglio, NMED HWB
W. Price, OCD
B. Wilkinson, EPA Region 6
C. Hurtado, GRCB
File: GRCB 2007 and Reading
HWB-GRCB-07-001

River Terrace Bioventing System Monitoring
 Table 2 - Soil Vapor Monitoring

Location	Matrix	* Injection Pressure	* Injection Flow Rate	% CO2	%O2	Organic Vapors PID	Pressure	Analytical
MW-49	A			Q	Q	Q	Q	Q-b, GRO
DW-1	A			Q	Q	Q	Q	Q-b, GRO
TP-1	A			Q	Q	Q	Q	Q-b, GRO
TP-2	A			Q	Q	Q	Q	Q-b, GRO
TP-3	A			Q	Q	Q	Q	Q-b, GRO
TP-5	A			Q	Q	Q	Q	Q-b, GRO
TP-6	A			Q	Q	Q	Q	Q-b, GRO
TP-7	A			Q	Q	Q	Q	Q-b, GRO
TP-8	A			Q	Q	Q	Q	Q-b, GRO
TP-9	A			Q	Q	Q	Q	Q-b, GRO
TP-10	A			Q	Q	Q	Q	Q-b, GRO
TP-11	A			Q	Q	Q	Q	Q-b, GRO
TP-12	A			Q	Q	Q	Q	Q-b, GRO
TP-13	A			Q	Q	Q	Q	Q-b, GRO
BV-1	A	Q	Q					
BV-2	A	Q	Q					
BV-3	A	Q	Q					
BV-4	A	Q	Q					
BV-5	A	Q	Q					
BV-6	A	Q	Q					
BV-7	A	Q	Q					
BV-8	A	Q	Q					
BV-9	A	Q	Q					
BV-10	A	Q	Q					
BV-11	A	Q	Q					
BV-12	A	Q	Q					
BV-13	A	Q	Q					

Field Parameters

% CO₂ - percent carbon dioxide

% O₂ - percent oxygen

PID - photoionization detector

Sampling Frequency

Q - quarterly

Matrix

A - soil gas

Analytical Analysis

b - BTEX by EPA Method 8021B

GRO - gasoline range organics by EPA Method 8015B

*Pressure - Full system and individual well injection pressures and injection flow rates must be recorded during each monitoring event.

During May 2007 - Perform In-SITU RESPIRATION TEST

Must be conducted under similar conditions as the 5/06 respiration test (e.g. similar groundwater levels and river levels)

Shutdown blowers and monitoring oxygen/carbon dioxide levels in TP-1, 2, 5, 6, 8, 9, and each of the 13 BV wells.

Monitor location	Analytes(s)	Frequency	Duration	
TP-1, 2, 5, 6, 8, 9	O ₂ , CO ₂ , VOCs	every 1 hour	first 8 hours	TP - Temporary Wells VOCs - Volatile Organic Carbons O ₂ - Oxygen CO ₂ - Carbon Dioxide
TP-1, 2, 5, 6, 8, 9	O ₂ , CO ₂ , VOCs	every 12 hours	next 48 hours	
All BV wells	O ₂	every 12 hours	first 72 hours	