

GRCB 07



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ENTERED

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 22, 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: NOTICE OF DISAPPROVAL
FACILITY-WIDE GROUNDWATER MONITORING PLAN
GIANT REFINING COMPANY, BLOOMFIELD REFINERY
EPA ID # NMD089416416
HWB-GRCB-07-003**

Dear Messrs. Schmaltz and Riege:

The New Mexico Environment Department (NMED) has completed its review of the *Facility-wide Groundwater Monitoring Plan* (Monitoring Plan) dated July 2007, submitted on behalf of Giant Refining Company, Bloomfield Refinery (GRCB). A revised Monitoring Plan must be submitted incorporating the changes required below.

Comment 1

Section 4.1 (Monitoring and Sampling Methods) through Section 4.4.8 (Laboratory Reporting, Documentation, Data Reduction, and Corrective Action) of the Monitoring Plan appear to be excerpts from NMED's Order (Order) dated July 27, 2007. These Sections appear to be slightly reworded or are missing information [e.g. Section 4.4.4 (Laboratory Deliverables) is missing items 17 d, e, and f]. Altering language from the Order in a monitoring plan, work plan, or report can change the meaning of the Order.

GRCB must either revise all sections in the Monitoring Plan to reference the applicable sections of the Order or revise all sections to include the exact wording from the Order.

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Comment 2

GRCB must revise Section 4.1.1 (Groundwater Levels) to include the collection of groundwater and separate phase hydrocarbon (SPH) level measurements in all wells on a quarterly basis. This will help in evaluating groundwater level fluctuations at the facility.

Comment 3

GRCB must revise Section 4.1.8 (Collection and Management of Well Purge Water) to address the disposal of non-dedicated sampling equipment.

Comment 4

GRCB addresses sampling locations, sampling frequency and sample analyses of the "Refinery Complex" area in Sections 5.1.1 (Sampling Locations) and 5.1.2 (Sampling Frequency and Analyses) of the Monitoring Plan.

GRCB must revise these sections to include sampling of monitoring well MW-8 during the semi-annual sampling event and include the sampling of monitoring wells MW-21, MW-29, MW-30, MW-31, MW-40, and MW-44 during the annual sampling event provided SPH is not present in the wells. These wells, with the exception of MW-8, MW-40 and MW-41, monitor groundwater in the tank farm area.

Comment 5

GRCB addresses the "Refinery Complex" sample collection frequency and analyses in Section 5.1.2 of the Monitoring Plan.

GRCB must revise this section and any applicable tables to include analysis for diesel range organics (DRO) extended and gasoline range organics (GRO) during the semi-annual and annual sampling events.

Comment 6

GRCB states in Section 5.3.1 (Monitoring and Sampling Locations) that "[c]atchments associated with Seep North of MW-45, Seep North of MW-46, and Seep North of MW-47 are visually monitored bi-monthly."

The Order addresses the seeps north of MW-45, north of MW-46, and north of MW-47 as Areas of Concern (AOC) which include the "catchments." Use of the term "catchments" could lead the reader to believe that these are additional or new AOCs separate from the seeps located north of MW-45, MW-46, and MW-47. To avoid confusion, the term "catchments" must be removed from the Monitoring Plan and the sentence should be revised to state "[t]he Seep North of MW-45, Seep North of MW-46, and Seep North of MW-47 are visually inspected bi-monthly."

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Comment 7

GRCB discusses the frequency of sample collection and analyses of groundwater samples collected from wells associated with the North Boundary Barrier in Section 5.2.2 (Sampling Frequency and Analyses).

GRCB must revise this section and any applicable tables to include the analysis of GRO for samples collected from the observation wells to monitor the presence of light hydrocarbons.

Comment 8

GRCB states in Section 5.4.2 (Sampling Frequency and Analysis) “[t]he sampling program detailed below has been developed to be compliant with the draft July 2007 NMED Order and is consistent with the Bioventing Monitoring Plan (Revised) River Terrace Voluntary Corrective Measures (October 28, 2005). If modifications to the Bioventing Monitoring Plan are approved by NMED that result in a change to the groundwater sampling frequency or analysis, then those approved changes will supersede the following specified activities.”

NMED has revised the sampling requirements from the Bioventing Monitoring Plan (Revised) in correspondence dated October 28, 2005. The groundwater sampling requirements for the River Terrace are provided in Table 1 (Groundwater Monitoring) of NMED’s letter dated April 18, 2007. GRCB must revise this section and any applicable tables to include the requirements outlined in the above-referenced Table 1 (Groundwater Monitoring) in the Monitoring Plan groundwater sampling requirements.

Comment 9

GRCB must make the following revisions to Figure 2 (Site Plan):

- a. Add MW-37 to the figure.
- b. Add symbols to show actual well locations to the figure, as it currently depicts the well identification.

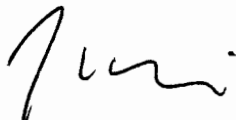
Comment 10

GRCB must revise any tables associated with the changes established above.

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GRCB must submit a revised Monitoring Plan and a response letter that details where the information was revised, cross-referencing NMED's numbered comments. The revised Monitoring Plan must be submitted to NMED on or before January 31, 2008. If you have questions regarding this approval please contact me at 505-476-6045.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

cc: J. Kieling, NMED HWB
D. Cobrain, NMED HWB
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HWB-GRCB-07-003