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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 25, 2008

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

**RE: APPROVAL WITH DIRECTION  
EVALUATION OF INTERIM MEASURES  
GIANT REFINING COMPANY, BLOOMFIELD REFINERY  
EPA ID # NMD089416416  
HWB-GRCB-08-001**

Dear Mr. Schmaltz

The New Mexico Environment Department (NMED) has completed its review of the *Evaluation of Interim Measures* (Report) dated January 2008, submitted on behalf of Giant Refining Company, Bloomfield Refinery (Giant). NMED hereby approves Giant's recommendations as provided in the Report with additional direction. Some of the approved recommendations have been incorporated into the *Facility Wide Groundwater Monitoring Plan* in an attempt to coordinate all sampling activities into one plan. The Permittee must adhere to all requirements established below.

**Comment 1**

In Section 6 (Summary of Recommendations), page 11, bullet 1, Giant states "[m]easure water levels while recovery wells are in operation to allow an evaluation of the capture zone of the system and again after pumps have been removed and water levels have stabilized."

This recommendation has been modified and added to NMED's Approval with Direction regarding the Facility Wide Groundwater Monitoring Plan, dated March 25, 2008. This letter

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states in Section 4.1.1 (Groundwater levels), page 4-1 “[g]roundwater and SPH levels will be measured in all wells within 48 hours of the start of groundwater sampling activities. All automated and manual extraction of SPH and water from recovery wells, observation wells, and collection wells will be discontinued for 48 hours prior to the measurement of water and SPH levels.”

Giant must revise the above sentence to incorporate bullet 1 of Section 6.0 of the Interim Plan which states “water levels in all wells will be measured while the recovery wells are in operation to allow evaluation of the system’s capture zone and again after the pumps have been removed and water levels have stabilized.”

**Comment 2**

Section 6 (Summary of Recommendations), page 11, bullet 2, Giant states their intent to “[d]iscontinue recovery from the collection wells and recover from only observation wells with LNAPL using passive measures (e.g.; absorbent sock);”

Giant may cease recovery of SPH from collection and observations wells. At this point in time, absorbent socks are not required. However, Giant must collect depth to water and depth to product measurements from all observation and collection wells, MW-45 and MW-47 twice a week at regular intervals for three months, starting April 1, 2008. The data must be compiled in table format and submitted to NMED and OCD on or before July 17, 2008. The compiled data will be discussed at the end of the three month period to determine a course of action, if one is needed. If more than one foot of SPH is discovered in any observation well, MW-45, or MW-47 located on the river side of the barrier wall during the three months, NMED and OCD must be notified immediately. Future requirements will be incorporated into the Facility Wide Groundwater Monitoring Plan.

**Comment 3**

Section 6 (Summary of Recommendations), page 12, bullet 1, Giant states “[c]ontinue to gauge all observation and collection wells on a bi-weekly basis;”

See Comment 2 above.

**Comment 4**

Section 6 (Summary of Recommendations), page 12, bullet 2, Giant states “[d]iscontinue recovery of water at the seep catchment basins and implement semi-annual monitoring at the Seeps #1, #6, #7, #8, and #9 on a semi-annual basis to monitor for the presence of volatile and semi-volatile constituents of concern.”

This recommendation has been modified and added to NMED’s Approval with Direction letter dated March 25, 2008 regarding the Facility Wide Groundwater Monitoring Plan. This letter

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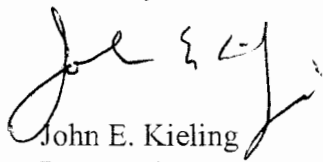
states in Section 5.3.1 (Monitoring and Sampling Locations), page 5-3, that “[s]eep North of MW-45, Seep North of MW-46, and Seep North of MW-47 are visually inspected bi-monthly.” Seep North of MW-45, Seep North of MW-46, and Seep North of MW-47 were general locations identified during the initial discovery of hydrocarbon releases to the bluff. Since remedial activities began, specific locations have been identified as Seep 1 through Seep 9. Seep 3 and 4 are secondary catchments to Seep 1. Seeps 2 and 5 have had historic flows but groundwater discharge at these Seeps has ceased since the installation of the slurry wall. Currently, Seeps 2, 3, 4, and 5 have no current discharges of groundwater.

Giant must visually inspect all seep locations (#1 through #9) on a weekly basis to determine if there is evidence of an active groundwater discharge and record the findings (the above quote must be revised to state weekly instead of bi-monthly). Giant must collect samples from Seeps 1, 6, 7, 8, and 9, if sufficient water is present, on a semi-annual basis during April and October. These samples must be analyzed for benzene, toluene, ethyl benzene, xylenes (BTEX), methyl tert-butyl ether (MTBE), semi volatile organic compounds (SVOCs) using EPA Method 8270, and general chemistry. If active discharges are present in Seeps 2, 3, 4, or 5, a sample must be collected during the semi-annual sampling event and analyzed for the above parameters. Water must be recovered from any of the seeps when the analytical results exceed any of the standards set by the Water Quality Control Commission (WQCC), the EPA Maximum contaminant Level (MCL), or in the absence of a WQCC standard or MCL, the EPA Region 6 Human Health Medium Specific Screening Levels (Tap Water).”

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If you have questions regarding this Approval with Direction please contact Hope Monzeglio of my staff at 505-476-6045.

Sincerely,



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

cc: D. Cobrain, NMED HWB  
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