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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  
FACILITY-WIDE GROUNDWATER MONITORING PLAN  
GIANT REFINING COMPANY, BLOOMFIELD REFINERY  
EPA ID # NMD089416416  
HWB-GRCB-07-003**

Dear Mr. Schmaltz

The New Mexico Environment Department (NMED) and the Oil Conservation Division (OCD) have completed its review of the *Facility-Wide Groundwater Monitoring Plan* (Monitoring Plan) dated December 2007, submitted on behalf of Giant Refining Company, Bloomfield Refinery (Giant). NMED hereby approves the Monitoring Plan with direction. In an effort to have all sampling requirements in one plan, NMED has incorporated some additional requirements from the recommendations provided in the *Evaluation of Interim Measures* (Interim Plan) document from Giant, dated January 2008. The Permittee must adhere to all requirements established below.

**Comment 1**

In Section 4.1.1 (Groundwater levels), page 4-1, Giant states “[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.”

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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. A revised replacement page(s) must be submitted to NMED and OCD.

**Comment 2**

Giant 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).

Giant must revise the text in Section 5.3.1 and Table 3 to reflect the above name and sampling changes and submit replacement pages to NMED and the OCD. Giant must revise Figure 2 (Site Plan) to include the locations of all seeps and submit a figure. In addition, all future figures must depict these seeps.

**Comment 3**

Giant must revise Table 3 to include sump recovery wells SW-1, SW-2, SW-3, SW-4, SW-5, SW-6, and SW-7 which, must be monitored during every major precipitation event. If free product is present, the sumps must be evacuated to prevent releases along the bluff. This information must be documented in the annual groundwater monitoring reports and kept on file

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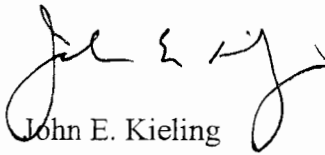
at the facility. A revised Table 3 must be submitted to NMED and OCD.

**Comment 4**

Giant provides analytical data in Appendix A. Some of the method detection limits/reporting limits exceed the established standard (e.g., MCL). For future sampling, Giant must ensure the method detection limits are less than the established standards. If the method detection limits exceed the established standards, an explanation must be provided in the annual groundwater monitoring report. NMED and/or OCD may require additional sampling if this occurs.

Giant must submit hard copies and an electronic copy of all replacement pages to NMED and OCD on or before May 15, 2008. Giant must ensure these changes are incorporated during the next sampling event. 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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