



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
INTERFIRST TWO BUILDING, 1201 ELM STREET
DALLAS, TEXAS 75270
November 12, 1986

*File Giant
Gen. Cor.*

Mr. Robert McClenahan
Environmental Coordinator
Giant Refinery
Route 3, Box 7
Gallup, New Mexico 87301

Re: Visual Site Inspection
Giant Refinery
NMD000333211

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NOV 13 1986
HAZARDOUS WASTE SECTION

Dear Mr. McClenahan:

The RCRA Hazardous and Solid Waste Amendments of 1984 under Section 3004(u) require a RCRA Facility Assessment (RFA) for your facility as part of the permitting process. The objective of this evaluation is to determine whether there have been, or are likely to be, releases of hazardous wastes or hazardous constituents at the facility which will require further investigation. This analysis will provide information to establish priorities for a subsequent RCRA Facility Investigation if needed.

An integral part of the RFA is a visual site inspection to verify and determine the location of all "Solid Waste Management Units" (SWMUs). SWMUs are defined as "any discernible solid waste unit at a RCRA facility from which hazardous wastes or constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste" (USEPA, 1986). The SWMUs definition includes container storage units; tanks; surface impoundments; waste piles; land treatment units; landfills; incinerators; underground injection wells; physical, chemical and biological treatment units; recycling units; and areas contaminated by routine, systematic, and deliberate discharges from process areas.

We will visit your facility for the purpose of inspecting these SWMUs. This inspection is to enable EPA to attain a technical understanding of current and historical waste flows. Photographs of each SWMU are to be taken to document conditions at the facility and the waste management procedures. No samples will be taken during this inspection.

EPA may require the assistance of some of your personnel in reviewing solid waste flows, associated units, past and present disposal practices, construction and details of units, and any other solid waste management information.