



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270
January 16, 1987

Marc

MEMORANDUM

Subject: Transmittal of Preliminary Review Summary

From: Erlece P. Allen, Chief
Technical Section (6H-CT)

Detach & forward Wright for

To: William K. Honker, Chief
Permit Section (6H-CP)

Attached please find a copy of the following Preliminary
Review Summary:

° Facility Name: Giant Ciniza Refinery

° EPA ID Number: NMD000333211

Please advise us if more information is required and/or if you
need further assistance.

Attachment

cc: Sam Becker (6H-C)

RCRA PRELIMINARY REVIEW SUMMARY

Region VI, Technical Compliance Section

FACILITY'S NAME(S): Gaint Ciniza Refinery

EPA ID NUMBER: NMD000333211

ADDRESS: Rt. 3, Box 7 Gallup, New Mexico 87301

LOCATION: Gallup, New Mexico (McKinley County) Lat. 35'-29" Long. 108'-26".

PREPARED BY: Black & Veatch DATE PREPARED: December 30, 1986

REVIEWED BY: Renee Kennedy DATE REVIEWED: Jan. 14, 1987

ANTICIPATED DRAFT PERMIT DATE: 3rd quarter, 1987

ANY ON-GOING STATE/FED 264, 265, or 270 CORRECTIVE ACTION OR CERCLA ACTION: None

DOES FACILITY HAVE A CERCLA FILE? YES NO X

Was a CERCLA PA/SI performed at this facility: No

DOES FACILITY HAVE A UIC WELL? YES NO X

TYPE OF DRINKING WATER SUPPLY WITHIN A 3-MILE RADIUS: Sonsela Sandstone is used for domestic, agricultural and industrial purposes.

TARGET POPULATION WITHIN A 3-MILE RADIUS: Immediate receptors are limited to workers at the refinery. Seven residences for refinery employees are located of the southeast corner of the property.

RECOMMENDATIONS: X V.S.I. R.I. I.M. No Further Action under RFA

(Indicate only one unless I.M. is marked)

 X 3004(u) 3007

Possible Enforcement Actions: 3008(a) 3008(h)

I. Preliminary Review of Prior or Continuing Releases of Solid Waste Management Units (SWMU)

A. Evaluation of Information

1. The main purpose is to determine whether there has been or may have been a release(s) of hazardous waste or hazardous constituents from any SWMUs which will require corrective action measures under Section 3004(u) of the RCRA Hazardous and Solid Waste Amendments (HSWA) of 1984. The SWMUs units of concern are:
 - a) SWMUs not regulated under RCRA; and
 - b) SWMUs regulated under RCRA regardless of whether they are subject to ground water monitoring requirements.
2. The purpose of this review is to:
 - a) Identify all SWMUs;
 - b) Identify if there have been prior or continuing releases of hazardous wastes or hazardous constituents from such units to any media (air, surface water, ground water, soil & sub-surface gas);
 - c) Determine if such releases caused environmental contamination that would require corrective action; and
 - d) Determine what additional information or investigation is needed to clarify whether there has been a release or if a potential for a release exists.

B. NUMBER OF SOLID WASTE MANAGEMENT UNITS (SWMU): 38

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>STATUS**</u>	<u>SUBJECT TO*** GWM SUBPART F</u>
(1) Landfill (#1)	Y	I	Y
(2) Landfill (#2)	Y	I	Y
(3) Landfill (#3)	Y	I	Y
(4) Landfill (#4)	Y	I	Y
(5) Landfill (#5)	Y	A	Y
(6) Tank Farm (6 areas)	?	I	N
(7) Burn Pit	?	I	N
(8) Evaporation Pond (#1)	?	A	?
(9) Evaporation Pond (#2)	?	A	?

* Y - Yes
 N - NO
 ? - unknown

** Active or Inactive (A or I)
 *** GWM-Ground Water Monitoring

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>STATUS</u>	<u>SUBJECT TO GWM SUBPART F</u>
(10) Evaporation Pond (#3)	?	A	?
(11) Evaporation Pond (#4)	?	A	?
(12) Evaporation Pond (#5)	?	A	?
(13) Evaporation Pond (#6)	?	A	?
(14) Evaporation Pond (#7)	?	A	?
(15) Evaporation Pond (#8)	?	A	?
(16) Evaporation Pond (#9)	?	A	?
(17) Evaporation Pond (#10)	?	A	?
(18) Evaporation Pond (#11)	?	A	?
(19) Evaporation Pond (#12)	?	A	?
(20) Evaporation Pond (#13)	?	A	?
(21) Evaporation Pond (#14)	?	A	?
(22) Evaporation Pond (#15)	?	A	?
(23) Evaporation Pond (#16)	?	A	?
(24) Evaporation Pond (#17)	?	A	?
(25) Sewage Lagoon (#1)	N	A	N
(26) Sewage Lagoon (#2)	N	A	N
(27) Sewage Lagoon (#3)	N	A	N
(28) Sewage Lagoon (#4)	N	A	N
(29) Railroad Rack Lagoon	?	A	?
(30) Sludge Pit (#1)	?	I	?
(31) Sludge Pit (#2)	?	I	?
(32) Asphalt Pit	?	I	?
(33) Land Treatment (#1)	?	Closed	N
(34) Land Treatment (#2)	Y	A	Y
(35) Container Storage	?	I	N
(36) Container Storage	?	A	N
(37) API Separator	N	A	N
(38) Neutralization Tank	N	A	N

C. NUMBER OF SWMU, AT WHICH RELEASES HAVE BEEN IDENTIFIED: 16

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>RELEASE TO</u>	<u>NOTED DOCUMENTATION OF RELEASE</u>
(1) APIS Evaporation Ponds (8-14)	?	Soil	Brine or salt desposits indicate past seepage from the south side of unit 10. Fluids in sand pipe 5 on the west side of units 10 and 11 provides evidence of seepage. Salt deposits have also been found in the ditch leaving the property along the south side of unit 10 (Boyer 1986).
(2) Evaporation Ponds (15-23)	?	Soil (to grade)	Seepage has been observed south and west of unit 19 and on the northside of units 20-23
(3) Asphalt Pit	?	Soil (to grade)	GCR, 1985a, "Discharge Plan, p.47

D. NUMBER OF SWMU, (REGULATED) AT WHICH RELEASES TO GROUNDWATER HAVE BEEN IDENTIFIED: 7

<u>LIST OF SWMU</u>	<u>RELEASE TO</u>	<u>NOTED DOCUMENTATION OF RELEASE</u>
(1) Landfill (Units 1-5)	GW	11-80, 6-81, 9-81, 1-85, 12-80, 2-85, 1-81 and 1-85 sampling rounds (GCR)
(2) Landfill Treatment Units (33-34)	GW	Appendix F Part B Permit Application

E. NUMBER OF SWMU AT WHICH A RELEASE IS HIGHLY POSSIBLE: 1

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA</u>	<u>REASONS</u> (i.e., waste characteristics, depth of GW, soil permeability, etc.)
(1) Tank Farm	?	Construction of Unit.

F. NUMBER OF SWMU WHERE A DETERMINATION OF RELEASE CAN NOT BE MADE DUE TO LACK OF INFORMATION: 32

LIST OF SWMU

- (1) Landfills (Units 1-5)
- (2) Burn Pit
- (3) APIS Evaporation Ponds (Units 8-14)
- (4) NT Evaporation Ponds (Unit 15-23)
- (5) Inactive Evaporation Pond Unit 24
- (6) Railroad Rock Lagoon
- (7) Sludge Pits (Units 30 and 31)
- (8) Asphalt Pit
- (9) Inactive Land Treatment (Unit 33)
- (10) Active Land Treatment
- (11) Inactive Container Storage
- (12) Active Container Storage
- (13) API Separator
- (14) Neutralization Tank

F. NUMBER OF SWMU WITH NO INDICATED RELEASES: 4

LIST OF SWMU

- (1) Sewage Lagoons (Units 25-28)

II. RECOMMENDATIONS: (EPA, STATE and/or CONTRACTOR)

Contractor The contractor recommends a Visual Site Inspection for the entire facility excluding the sewage lagoons. The contractor also recommends that additional units be included in the VSI to determine their potential to be a SWMU.

EPA EPA agrees with the contractor's recommendation.

CONCUR:



DATE:

1-15-87