

11arc

GRCC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
ALLIED BANK TOWER AT FOUNTAIN PLACE
1445 ROSS AVENUE
DALLAS, TEXAS 75202

May 18, 1987

MEMORANDUM

Subject: Transmittal of Visual Site Inspection Summary
From: Erlece P. Allen, Chief Technical Section (6H-CT) *Erlece P. Allen*
To: William K. Honker, Chief Permit Section (6H-CP)

Attached please find a copy of the following Visual Site Inspection 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 VISUAL SITE INSPECTION SUMMARY
Region VI, Technical Compliance Section

FACILITY'S NAME(S): Giant Ciniza Refinery

EPA ID NUMBER: NMD000333211

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

LOCATION: Gallup, New Mexico

FACILITY CONTACT: Bob Anderson, Robert McClenahan PHONE: _____

SITE DESCRIPTION: This site produces gasoline, leaded and unleaded diesel fuel, jet fuel, propane, and naptha from crude oil.

PREPARED BY: Black & Veach DATE PREPARED: January 26, 1987

REVEIWD BY: Renee Kennedy DATE PREPARED: May 15, 1987

ANTICIPATED DRAFT PERMIT: 3rd Quarter, 1987

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

DATE OF INSPECTION: November 19 and 20, 1986

DOES FACILITY HAVE CERCLA SITES YES _____ NO X

TYPE OF DRINKING WATER SUPPLY IN 3-MILE RADIUS: Sonseb sandstone is used for domestic, agricultural and industrial purposes.

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

RECOMMENDATIONS: X SV _____ R.F.I _____ IM _____ No Further Action under RFA

X 3004(u) _____ 3007

Possible Enforcement Action: _____ 3008(a) _____ 3008(h)

I. Visual Site Inspection

A. Purpose

- * Verify PR Information
- * Identify additional releases
- * Assess Condition of Solid Waste Management Units (SWMU)
- * Aid in identifying Facility Releases
- * Assess need for Sampling
- * Determine Sampling Locations

B. NUMBER OF SWMU INVESTIGATED DURING THE VSI: _____

<u>LIST OF SWMU</u>	<u>REGULATED BY RCRA*</u>	<u>STATUS**</u>	<u>SUBJECT TO GWM***</u> <u>SUBPART F</u>
1) Tank Farm (Tank 570)	?	I	N
2) Burn Pit	?	I	?
3) Landfills 1-4	Y	I	Y
4-6) Landfill 5	Y	A	Y
7) Inactive Container Storage	?	I	N
8) Active Land Treatment	Y	A	Y
9) Neutralization Tank	N	A	N
10) Ditch from Neutralization Tank	N	A	N
NT Evaporation Ponds (9)	?	A	N
API Separator			
APIS Evaporation Ponds (7)	?	A	N
14) Sludge Pits	?	I	?
15) Railroad Rack Lagoon	?	A	?
16) Inactive Land Treatment	?	I,CI	N
17) Asphalt Pit	?	I	?
18) Active Container Storage	?	A	N
20) Secondary Oil Skimmer	?	A	N
21) Contact Wastewater Collection System	N	A	N
22) Underground Storage Tank	?	I	N
23) Process Area	?	?	N
*24) Drainage Ditch from Secondary Oil Skimmer	?	A	N
*25) Railroad Rack Lagoon Outfall	?	A	N
*26) Drainage Ditch between APIS and NT Evaporation Ponds	?	A	N
*27) Drainage Ditch from the Process Area along the Railroad Spur	?	A	N
*28) Drainage Ditch Near the Inactive Land Treatment Area	?	A	N
*29) Fire Training Area	?	A	N
*30) Empty Container Storage Area	?	A	N

*This unit was identified during the VSI (not identified in the PR).

* Y-Yes

** Active or Inactive (A or I)

N-No

*** GWM-Ground Water Monitoring

C. NUMBER OF SWMU IDENTIFIED DURING THE VSI (NOT IDENTIFIED IN THE PR): _____

<u>LIST OF SWMU</u>	<u>STATUS **</u>
1) Drainage Ditch from Secondary Oil Skimmer	
2) Railroad Rack Lagoon Outfall	
3) Drainage Ditch between API Separator and Neutralization Tank Evaporation Ponds	
4) Drainage Ditch from the process area along the Railroad Spur	
5) Drainage Ditch Ner the Inactive Land Treatment Area	
6) Fire Training Area	
7) Empty Container Storage Area	
8) Alkylation Scrap Disposal	

D. NUMBER SWMU TO BE INCLUDED IN THE RFI: _____
(except RCRA units subject to Subpart F)

<u>LIST OF SWMU</u>	<u>RATIONALE</u>
1) Burn pit	This unit has been inactive since 1976 and managed acid soluble oils from the alkylation unit and possibly spent silicon oxide catalysts. The VSI indicated that no vegetation was growing in the pit.
2) Neutralization Tank	This tank is buried. What could be seen of the tank appeared in good condition and there was no evidence of seepage, discolored soil or stressed vegetation in the area. However, the pH of the was tested at 5 with pH paper. Facility personnel said that at certain times it tests much lower. It is recommended that effluent water samples be taken to verify pH.
3) Evaporation Pond 10/ (Ditch from Neutralization Tank)	Unlined ditch. It has been recommended that soil/sediment samples be taken.
4) NT Evaporation Ponds	White and orange deposits were observed at the pipe outlet from the neutralization tank site pond 3. Recommend that sludge and sediment samples be taken, at a minimum.
5) Drainage Ditch between APIS and NT Evaporation Ponds	Unlined ditch. Contractor recommends that soil and sediment samples be taken.

LIST OF SWMURATIONALE

- 6) APIS Evaporation Pond 2
There was a strong hydrocarbon odor and yellow scum floating on the surface of Pond 2 which receives effluent directly from the API Separator. It is recommended that sludge/sediment samples be taken, at a minimum.
- 7) Railroad Rack Lagoon
During the VSI, a hydrocarbon sheen was visible on the surface of the water and an orange/yellow suspension was visible in the water. This suspension was also visible on the banks of the lagoon. The soil on the edges of the lagoon was darkened and there was dead vegetation on the banks. It is recommended that sludge/sediment samples be taken, at a minimum.
- 8) Secondary Oil Skimmer
This unit has a tendency to overflow from the discharge pipe during large flows. The facility plans to replace the pipe. The contractor recommends water samples be taken.
- 9) Drainage Ditch between APIS and Evaporation Ponds
The ditch contained standing water. A yellow-white foam was visible at the pipe outlet. It is recommended that soil/sediment samples be taken.
- 10) Drainage Ditch near Inactive Land Treatment Area
A hydrocarbon sheen was evident on the water surface and a yellow suspension was visible in the water.
- 11) Fire Training Area
The source and destination of the contents of this area is unknown. Soil around the tank was discolored and it looked as if the tank may sometimes be drained and the liquid allowed to run off to the north of the tank. Recommend that soil samples be taken, at a minimum.
- 12) Empty Container Storage Area
No pallets and no runoff controls were observed. A yellow/green fluid was observed between and in front of the drums.

E. NUMBER OF SWMU REQUIRING NO FURTHER ACTION: 9

LIST OF SWMU

- 1) Landfill 5
- 2) Inactive Container Storage
- 3) API Separator
- 4) Asphalt Pit
- 5) Active Container Storage
- 6) Sewage Lagoons
- 7) Contact Waste Water Collection System
- 8) Underground Storage Tank 5
- 9) Process Area
- 10) Tank Farm (Tank 570)*
- 11) Asbestos Landfill (1 Cell of Unit 3)
- 12) Inactive Landfills (Units 1-4)
- 13) Active Landfill (Unit 5)
- *14) Active Land Treatment Area
- 15) Neutralization
- 16) API Separator
- 17) APIS Evaporation Ponds 12A & 12B
- 18) Sludge Pits " "
- 19) Asphalt Pit
- 20) Active Container Storage
- 21) Underground Storage Tanks
- 22) Active Container Storage
- 23) Underground Storage Tanks

*This unit is covered under Subpart F. However, from the VSI, it was apparent that the external dike between the land treatment area and the evaporation ponds to the southwest was less than two (2) feet above the surface of the land treatment plots.

F. NUMBER OF SWMU REQUIRING SAMPLING VISIT: 2

- 1) NT Evaporation Pond (#1 Pond)
- 2) APIS Evaporation Pond (#1 Pond)

G. SUPPLEMENTAL INFORMATION ON RCRA REGULATED UNITS: 0

H. ARE FACILITY MAPS/PHOTOS INCLUDED WITH ORIGINAL VSI REPORT? YES X NO

RECOMMENDATIONS: The contractor recommends a sampling visit for several of the SWMUs.

EPA recommends a sampling visit for 2 of the units:
(The first pond of the NT Evaporation Ponds and the first pond of the APIS Evaporation Ponds). The work is to be performed by the contractor.

CONCUR: *Greg T. Whelan*

DATE: 5/15/87

- | | |
|--|--|
| 11) Drainage Ditch from the Secondary Oil Skimmer (AOC 1) | Stormwater not captured by the Contact Wastewater Collection System, is collected by the ditch. The ditch flows into the Secondary Oil Skimmer (SWMU 39). NFOCD noted non-oil discharges from SWMU 39. |
| 12) Contact Wastewater Collection System (AOC 2) | The system collects water that may contain hydrocarbons and discharges to the API Separator. The sumps and collection points are concrete or have steel pans except for one unlined trench. |
| 13) Underground Tanks (AOC 3) | Two empty railroad tank cars were buried and used to store motor oil. They were later dug up and left standing southwest of the Railroad Rack Lagoon (SWMU 29). One of the tanks was re-buried and used as a surge tank to enhance mixing for pH neutralization. |
| 14) Drainage Ditch between the APIS and NT Evaporation Ponds (AOC 4) | Standing water observed during the VSI appeared discolored and foamy white substance was observed at a pipe outlet into the ditch. |
| 15) Drainage Ditch near the Inactive Land Treatment Area (AOC 6) | The contents and source of the ditch is unknown. A hydrocarbon sheen and yellow material suspended in the water were observed during the VSI. |
| 16) Drainage Ponds North of Unit 9 (AOC 9) | The ponds receive discharge from Unit 15. The second pond has overflow pipes that drain into a ditch leading to Unit 15. |
| 17) Drainage Ditch Northeast of Unit 9 (AOC 10) | The source, contents, and destination of the ditch is unknown. The ditch leads off-site. White deposits and dead vegetation were observed in the ditch during the VSI. |

D. NUMBER OF SWMUs FOR WHICH AN RFI IS NOT RECOMMENDED: 12

<u>LIST OF SWMUs</u>	<u>RATIONALE</u>
1) Landfill (SWMU 5)	Data indicate that wastes burned do not contain hazardous constituents.
2) Conveyance Ditch (SWMU 24)	The unlined ditch handled D002 type wastes (spent brine and HCl/c).

LIST OF SWMUsRATIONALE

- | | |
|--|---|
| 3-6) Sewage Lagoons (4)
(SWMU 25-28) | These units have received only sanitary wastes. |
| 7) Asphalt Pit (SWMU 32) | The wastewater discharged to the pit is unlikely to have contained hazardous constituents. |
| 8) Container Storage (SWMU 35) | There is no evidence that hazardous materials were stored in this area. |
| 9) Container Storage (SWMU 36) | Drums are temporarily stored on pallets over a large asphalt pad. The area is inspected regularly. There is no evidence of release in the area. |
| 10) API Separator (SWMU 37) | The above-ground concrete tank manages all waste streams at the facility. It consists of 2 parallel compartments. There is no evidence of releases from the unit. |
| 11) Neutralization Tank
(SWMU 38) | The underground carbon steel tank contains condensate from boilers and low pH wastewater. There is no evidence of releases from the unit. |
| 12) Drainage Ditch from Process Area along the Railroad Spur (AOC 5) | The ditch collects surface run-off from the process area and discharges off-site. The ditch appeared clean during the VSI. |

- E. SUPPLEMENTAL INFORMATION ON RCRA REGULATED UNITS: 1
(Describe any problems identified or suspected from regulated units including identified releases to groundwater)

LIST OF SWMUsCONCERNS

- | | |
|------------------------------------|--|
| 1) Active Land Treatment (SWMU 34) | Samples from groundwater monitoring wells taken in November 1985 and February 1986 detected elevated levels of arsenic, barium, cadmium, lead, manganese, chromium, selenium, and mercury. |
|------------------------------------|--|

II. FINDINGS

A. RECOMMENDATIONS:

1) Contractor

a) RFI

- 1-4) Landfills 1-4 (SWMU 1-4)
- 5) Tank Farm (SWMU 6)
- 6) Burn Pit (SWMU 7)
- 7) Railroad Rack Lagoon (SWMU 29)
- 8-9) Two Sludge Pits (SWMU 30-31)
- 10) Inactive Land Treatment (SWMU 33)
- 11) Active Land Treatment (SWMU 34)
- 12) Secondary Oil Skimmer (SWMU 39)
- 13) Drainage Ditch from the Secondary Oil Skimmer (AOC 1)
- 14) Underground Tanks (AOC 3)
- 15) Drainage Ditch between the APIS and NT Evaporation Ponds (AOC 4)
- 16) Drainage Ditch from Process Area along the Railroad Spur (AOC 5)
- 17) Drainage Ditch near the Inactive Land Treatment Area (AOC 6)
- 18) Fire Training Area (AOC 7)
- 19) Drainage Ditch Northeast of Unit 9 (AOC 10)

2) EPA

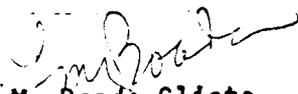
a) RFI

- 1-4) Landfills (4) (SWMUs 1-4)
- 5) Tank Farm (SWMU 6)
- 6) Burn Pit (SWMU 7)
- 7-13) APIS Evaporation Ponds (7) (SWMUs 8-14)
- 14-22) NT Evaporation Ponds (9) (SWMUs 15-23)
- 23) Railroad Rack Lagoon (SWMU 29)
- 24-25) Two Sludge Pits (SWMU 30-31)
- 26) Inactive Land Treatment (SWMU 33)
- 27) Secondary Oil Skimmer (SWMU 39)
- 28) Drainage Ditch from the Secondary Oil Skimmer (AOC 1)
- 29) Contact Wastewater Collection System (AOC 2)
- 30) Underground Tanks (AOC 3)
- 31) Drainage Ditch between APIS and NT Evaporation Ponds (AOC 4)
- 32) Drainage Ditch near the Inactive Land Treatment Area (AOC 6)
- 33) Fire Training Area (AOC 7)
- 34) Empty Container Storage Area (AOC 8)
- 35) Drainage Ponds North of Unit 9 (AOC 9)
- 36) Drainage Ditch Northeast of Unit 9 (AOC 10)

A. ADDITIONAL COMMENTS:

AOC 9 and AOC 10 may be recently constructed surface impoundments and ditches. Construction details should be obtained and any hazardous wastes that they manage should be documented.

CONCUR:


Lydia M. Boada Clista

DATE:

4/21/88