

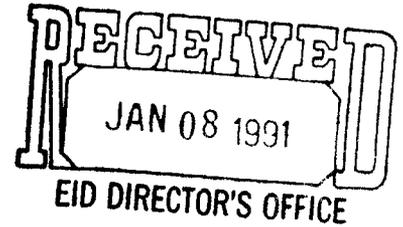


Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

January 3, 1991

Richard Mitzelfelt
Director
New Mexico Environmental Improvement Division
Harold Runnels Building
1190 St. Francis Drive
Santa Fe, New Mexico 87504-0968



RE: Correction to Personnel Training

Dear Mr. Mitzelfelt:

On December 20, 1990, Giant Refining Company requested a modification to the Personnel Training section (Attachment D) of the Part B Permit No. NMD-000333211-2. There was an error on page D-22 Section C.3 of the request. The words "...an excessive flame." are corrected to read "...the loss of the pilot.". Two pages of the attachments have the old and the new wording highlighted. The additional pages are corrected copies to update the request's that were sent to your office. Please update the existing page D-22 with the new page D-22.

I apologize for any inconvenience this may have caused. If you have any questions, contact my office at (505) 722-0217.

Sincerely,

Claud Rosendale
Environmental Manager
Ciniza Refinery

Attachments: Page D-22 - Personnel Training

cc w/attachments: Allyn M. Davis - U.S.E.P.A. Region 6
Kim Bullerdick - Giant Industries Arizona, Inc.

CCR/sp

- 2) A combination of high temperature, air injection, and water distribution over packing material allows benzene to disentrain from effluent water, reducing benzene and avoiding hazardous waste in ponds
 - 3) Strippers, pumps, blowers, and level switches should be monitored on an ongoing basis to prevent API flooding
- C. Flare Operation
- 1) The smokeless flare provides us with a low emissions flare that is acceptable to the state air quality control.
 - 2) Steam and air injected in variable quantities atomize and add oxygen to the flare feed for more efficient combustion
 - 3) An electric eye, connected to an alarm in the boiler house, monitors and signals the loss of the pilot
 - 4) The flare is an important tool in emissions and must be constantly watched
- D. Waste Water Effluent Management
- 1) To prevent hazardous waste contaminating soil and water at Ciniza
 - 2) API separator, benzene strippers, lagoons, ponds, and ditches all contribute to proper management of waste effluent
 - 3) All the above should be monitored and problems reported to the Environmental Department

ATTACHED IS A COPY OF THIS PAGE TO INSERT INTO THE
LABORATORY TRAINING OUTLINE, PAGE D-22. THE WORDS
"... AN EXCESSIVE FLAME." ARE REPLACED BY "... THE LOSS
OF THE PILOT."

- 2) A combination of high temperature, air injection, and water distribution over packing material allows benzene to disentrain from effluent water, reducing benzene and avoiding hazardous waste in ponds
- 3) Strippers, pumps, blowers, and level switches should be monitored on an ongoing basis to prevent API flooding

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D. Waste Water Effluent Management

- 1) To prevent hazardous waste contaminating soil and water at Ciniza
- 2) API separator, benzene strippers, lagoons, ponds, and ditches all contribute to proper management of waste effluent
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