



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

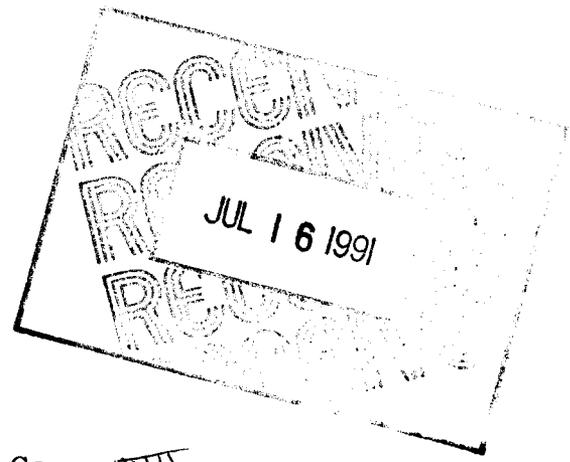
1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

JUL 9 1991

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John J. Stokes, Manager  
Giant Refining Company  
Route 3, Box 7  
Gallup, New Mexico 87301

RE: RFI Phase I Report - Giant Refining Co. XIII  
NMDO48918817

Dear Mr. Stokes:

We have completed a review of your RFI Phase I Report dated April 8, 1991, and have determined the Report to be approvable with one modification. Enclosed is the modification.

In addition, the Environmental Protection Agency (EPA) generally agrees with the finding of no further action for the Inactive Landfarm. However, the Agency believes that one administrative control is needed, which is a survey plat of the Inactive Landfarm, according to procedures required in 40 CFR 264.116. Also, Giant may initiate a Class III modification for the Natural Drainage Area to remove this Solid Waste Management Unit from the permit.

Before EPA can remove the Inactive Landfarm (approve a Class III permit modification) from the permit, Giant must certify and send documentation providing completion of the above mentioned administrative control. After the Agency receives and approves that requirement, Giant may request a Class III permit modification under 40 CFR 270.42, to remove the Inactive Landfarm from further investigation in the permit.

Furthermore, EPA will require Giant to submit a Final Remedy Plan (FRP), which must include the technical details and schedule for closure of the Railroad Rack Lagoon. This FRP shall be due to the Agency within 90 days of the receipt of this letter.

If you have any further questions concerning the above discussed issues, please contact Rich Mayer of my staff at (214) 655-6775.

Sincerely yours,

*Jack Divita*

*for*

Allyn M. Davis  
Director  
Hazardous Waste Management Division

Enclosure

cc: Benito Garcia, NMED

FACT SHEET FOR GIANT RFI REPORT APPROVAL WITH MODIFICATION

- The draft RFI Report was received by EPA on 11-28-90.
- SWMU's investigated included ten above ground tanks, a inactive landfarm, a surface impoundment, two waste pits, a overflow area, and a natural drainage area.
- EPA sent out a NOD on the report on 3-19-91.
- Giant's amended report recommended deeper soil samples at the overflow area, tanks, and waste pits. In addition, Giant recommended no further action at the inactive landfarm and the natural drainage area, and closure for the surface impoundment.
- EPA agrees with Giant's RFI Report recommendation except for the following:
  1. An additional deeper soil boring near one tank; and
  2. A survey plat of the inactive landfarm according to 40 CFR 264.116.
- The additional deeper soil boring for the tank is needed because the 7.5' soil sample previously taken during the RFI investigation indicated 10ppm BTEX. The Inactive Landfarm showed elevated levels of metals and organics in the top foot of soil. However, these levels were below action levels for those constituents. Therefore, only a survey plat of the unit is needed for safe measure.
- The Railroad Rack Lagoon investigation indicated low levels of organics 1-2' below the bottom of pond. Soil samples taken deeper showed no contamination. Giant decided to close this impoundment. EPA will require Giant to submit a Final Remedy Plan for this unit within 90 days of receipt of the of the RFI approval letter.

## FACT SHEET FOR GIANT RFI REPORT APPROVAL WITH MODIFICATION

- The draft RFI Report was received by EPA on 11-28-91.
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- EPA agrees with Giant's RFI Report recommendation except for the following:
  1. An additional deeper soil boring near one tank; and
  2. A survey plat of the inactive landfarm according to 40 CFR 264.116.
- The additional deeper soil boring for the tank is needed because the 7.5' soil sample previously taken during the RFI investigation indicated 10ppm BTEX. The Inactive Landfarm showed elevated levels of metals and organics in the top foot of soil. However, these levels were below action levels for those constituents. Therefore, only a survey plat of the unit is needed for safe measure.
- The Railroad Rack Lagoon investigation indicated low levels of organics 1-2' below the bottom of pond. Soil samples taken deeper showed no contamination. Giant decided to close this impoundment. EPA will require Giant to submit a Corrective Measure Study for this unit within 90 days of receipt of the RFI approval letter.

MODIFICATION OF GIANT  
RFI PHASE I REPORT

The below requirement shall be added to the RFI Phase I Report, dated, April 8, 1991, under the Tank Farm section (SWMU #6).

1. Giant shall take a one vertical soil sample in close proximity to the original soil sample number 20 from the Phase I RFI investigation. This sample shall be collected, logged, and analyzed the same as new samples numbered 21-29.