



BRUCE KING  
GOVERNOR

State of New Mexico  
ENVIRONMENT DEPARTMENT  
Harold Runnels Building  
1190 St. Francis Drive, P.O. Box 26110  
Santa Fe, New Mexico 87502  
(505) 827-2850

JUDITH M. ESPINOSA  
SECRETARY

RON CURRY  
DEPUTY SECRETARY

February 24, 1992

Lynn Shelton  
GIANT Refining Co.  
Route 3, Box 7  
Gallup, NM 87301

Dear Mr. Shelton,

NMED/HRMB has reviewed the information you have submitted regarding the air-strippers you now have in operation and the proposed activated carbon recovery system you propose to add to the air-strippers.

It is our decision that if the BTEX removal efficiency of the units you describe is as you have stated, then they would be considered recycling units and would not be subject to a RCRA permit. However, you are reminded that it is the responsibility of Giant Refining Co. to identify permitable waste streams or processes. If the proposed system does not perform as described, the air-stripper system may be permitable as a treatment system under 40 CFR section 264 subpart X (miscellaneous units), or subpart AA (process vents). It would be in the best interest of the facility to monitor the efficiency of the air-stripper/recycling system and maintain records of it's effectiveness to insure a clear interpretation of your permitting responsibilities.

If you have any questions regarding this issue, please contact Dr. Herb Grover at 827-4300.

Sincerely,

A handwritten signature in cursive script, appearing to read "Edward L. Horst".

Edward L. Horst  
RCRA Program Manager  
Hazardous and Radioactive Materials Bureau

BG/hdg:gnt224

xc: Herb Grover, NMED RCRA Permit Supervisor  
William H. Honker, EPA Region VI