



BRUCE KING
GOVERNOR

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GRC 92

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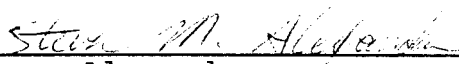
April 24, 1992

Mr. Zeke Sherman, Environmental Manager
Giant Refining Company
Route 3, Box 7
Gallup, New Mexico 87301

Dear Mr. Sherman:

Please find enclosed a schedule of compliance which has been developed for the Land Treatment Unit at the Giant Refining facility (Ciniza). This document represents a proposal which may enable Giant Refining Company (GRC) to determine whether migration of hazardous constituents has occurred below the five foot treatment zone of the Land Treatment Unit. Giant Refining Company may either submit this schedule of compliance or a proposal which GRC believes is adequate. If you have any questions please contact me at 827-4300.

Sincerely,



Steve Alexander
Hazardous and Radioactive Materials Bureau

cc: Bruce Swanton, HRMB
Steve Alexander, HRMB

Enclosure

ATTACHMENT A
COMPLIANCE SCHEDULE
(PROPOSED)

<u>Item Number</u>	<u>Days to Completion</u>	<u>Action</u>
1	10	GRC submits to NMED, from a selected laboratory, a complete listing of parameters to be included in the analyses done on fifty (50) soil samples taken from the LTU and background plots, including the method detection limit (MDL) and Practical Quantitation Limit (PQL) for each. The MDL is defined as the estimated concentration at which the signal generated by a known constituent is three standard deviations above the signal generated by a blank, and represents the 99% confidence level that the constituent does exist in the sample. The PQL is defined as that level of a target compound in the sample at which the actual concentration can be quantified. NMED will review this listing for adequacy of MDL's and PQL's and completeness of the parameters list.
2	10	GRC submits to NMED verification that: 1) it will use the background test plot identified in Figure 3, of Attachment B, for establishing background values for the regulated metals, 2) refinery wastes have never been applied to the background plot and 3) only non-hazardous, permitted wastes have been applied to plot number three of the LTU. GRC verifies that it will establish background using ten samples taken from evenly distributed locations within the background plot at a depth of from 5 to 5 1/2 feet below the surface level. Background values for the organic contaminants will be the Method Detection Limits (MDL) values listed in U.S.EPA document "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods, SW-846".

<u>Item Number</u>	<u>Days to Completion</u>	<u>Action</u>
3	30	<p>GRC submits to NMED New Mexico Coordinate System survey data which includes the following information:</p> <p>A. The surveyed elevation, above sea level, of twenty (20) surveyed locations within each of the two active treatment plots of the LTU and the surveyed elevations of ten (10) locations within the background plot identified in Figures 1, 2, and 3 of Attachment B. The elevations must be to the one-tenth of a foot (0.10'). Each surveyed location must be assigned an identifying code or number. The locations must be selected within each plot such that the distances between selected points are approximately equal. Points selected at the perimeter of the LTU plots must be no nearer the perimeter than 20 feet. The elevation survey must be performed by a licensed surveyor unaffiliated with GRC.</p> <p>B. A map drawn to scale of the LTU, including the background plot, with scale and north arrow, indicating the surveyed location and surveyed elevation of each sampling point. A copy of the map must be submitted with one-foot contours using data from the survey conducted for the purpose of this Order. Also, the locations and code name or number of each of the 50 sample locations described in item 3.A, above, must be included.</p> <p>C. The name and affiliation of the licensed surveyor referred to in item 3.A, above.</p>

<u>Item Number</u>	<u>Days to Completion</u>	<u>Action</u>
4	45	<p>GRC submits analytical reports to NMED.</p> <ol style="list-style-type: none"> 1) The fifty (50) coring samples from the background plot and the LTU must be evaluated for all parameters listed in Appendix IX to 40 CFR of Section 264, including Acetone and excluding dioxanes and furans. Core samples must be collected at each of the 20 surveyed points in each of the two active plots of the LTU. Samples taken within the LTU will be collected in the zone between 5 and 5.5 feet below the original surface level. GRC must document its procedure to ensure that the samples are collected at this depth. 2) One trip blank for volatiles must be included. 3) QA/QC procedures must be as per Attachment C and U.S.EPA document "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods, SW-846".

The analytical report must include:

- 1) All constituents identified above the Method Detection Limit.
- 2) All raw laboratory data sheets organized by sample number including data for all samples collected in the background plot and in the LTU. The laboratory data sheets must include data for all of the parameters referred to in item 1.
- 3) Summaries for each sample of any constituent identified above the MDL.
- 4) The report must have all pages consecutively numbered and include a comprehensive table of contents.

<u>Item Number</u>	<u>Days to Completion</u>	<u>Action</u>
5	75	GRC submits to NMED statistical calculations and narrative conclusions on the comparison for metals between the background plot and the below-treatment-zone soil cores from the two plots in the LTU. Statistical comparisons will be made for each of the regulated metals between the background plot and each of the two land application plots using Cochran's Approximation to the Behrens-Fisher Student-t test at the 0.05 level of confidence.