

GRCC 92



May 11, 1992

NOT APPROVED

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833

Mr. Steve Alexander
Water Resource Specialist
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
525 Camino De Los Marquez
Santa Fe, New Mexico 87502

Re: LTU Sampling Schedule

Dear Mr. Alexander:

I have enclosed a sampling schedule that should adequately address the question as to whether hazardous constituents have migrated below the treatment zone at Giant's LTU.

Some of the main points in the sampling schedule are that: 1) we agree to sample forty locations as per the plan without compositing samples, 2) we run the full Appendix IX list including Acetone, but excluding dioxins, furans, and all metals except chromium, cadmium and lead and, 3) we use the Land Treatment Demonstration background data on metals for statistical comparisons.

If this plan is acceptable to the Hazardous and Radioactive Materials Bureau, we would like to make the effective date, June 1, 1992. This will give Giant the additional time it needs to complete several short fuse in-house projects.

If you have additional changes to the plan or questions, please contact me at your earliest convenience.

Respectfully yours,

Zeke Sherman
Environmental Manager
Ciniza Refinery

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To	From	
Co.	Co.	
Dept.	Phone #	
Fax #	Fax #	

ZS:ap

cc: John Stokes
Refinery Manager
Ciniza Refinery

**SAMPLING SCHEDULE
(PROPOSED)**

<u>Item Number</u>	<u>Days to Completion</u>	<u>Action</u>
1	10	GRC submits to the New Mexico Environment Department, a complete list of constituents to be included in the analyses done on 40 soil samples taken from the LTU. This list will include the Method Detection Limit (MDL) and Practical Quantification Limit (PQL) for each constituent. The MDL and PQL are defined in SW-846 (latest edition). The New Mexico Environment Department will review this listing for adequacy of MDL's and PQL's and completeness of the constituent list.
2	10	GRC submits to the New Mexico Environment Department verification that, 1) it will use background test plot data from the facility's land treatment demonstration as background values for the regulated metals. Background values for the organic contaminants will be the Method Detection Limit (MDL) values listed in U.S. EPA document "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846", 2) refinery wastes have never been applied to the background plot and, 3) only non-hazardous or non-regulated wastes have been applied to plot number three of the LTU.
3	30 July	<p>GRC submits to the New Mexico Environment Department, New Mexico Coordinate System survey data which includes the following information:</p> <p>A. The surveyed elevation above sea level, of (40) surveyed locations within the active treatment plot of the LTU. 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 distance between selected points are approximately equal. Points selected at the perimeter of the LTU plot 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 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 schedule. Also, the locations and code name or number of each of the (40) sample locations described in line 3. A., above, must be included.</p>

C. The name and affiliation of the licensed surveyor is referred to in item 3. A., above.

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GRC submits analytical reports to the New Mexico Environment Department.

A. The forty (40) sampling locations will be evaluated for ~~Appendix IX~~ to 40 CFR of Section 264 semi-volatiles (Method 8270 or equivalent), including Acetone and excluding dioxins and furans. The following Appendix IX total metals will be analyzed: Cadmium, Chromium, and Lead.

8240 ⇒ volatile Org

Samples taken in this LTU will be collected in the zone between 5 and 5.5 feet below the original surface level. GRC will document its procedure to ensure that the samples are collected at this depth.

B. One trip blank for volatiles will be included.

C. QA/QC procedures must be as per ^{**}U.S. EPA document "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846".

The analytical report must include:

- 1) Original analytical report from the laboratory including; sampling, receiving, extraction and analysis dates, standard and project specific quality control data, method and sample laboratory identification.
- 2) All constituents identified above the Method Detection Limit.
- 3) Summaries for each sample of any constituent identified above the Method Detection Limit.
- 4) The report must have all pages consecutively numbered and include a comprehensive table of contents.

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90 Sept

GRC submits to the New Mexico Environment Department statistical calculations and narrative conclusions on the comparison for total metals between the background plot and the (40) below treatment zone from the LTU. Statistical comparisons will be made for each of the regulated metals listed in item 4.A above between the land treatment demonstration background plot data and the active land treatment unit using Cochran's Approximation to the Behrens-Fisher Student t test at the 0.05 level of confidence.