



BRUCE KING
GOVERNOR

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JUDITH M. ESPINOSA
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 11, 1992

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

Re: May 11, 1992 LTU Sampling Schedule Proposal

Mr Sherman:

During Hazardous and Radioactive Materials Bureau (HRMB) review of Giant Refining Company's (GRC) proposed Sampling Schedule to characterize the facility Land Treatment Unit (LTU) staff member Steve Alexander noted a significant discrepancy. Under Item 4,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...". In order for the schedule to be acceptable Item 4,A. must be corrected to read: "The forty (40) sampling locations will be evaluated for Appendix IX to 40 CFR of Section 264 semi-volatiles and volatiles (Method 8270 and 8240 or equivalent), including...". On May 13, 1992 Steve Alexander contacted you by phone and was assured this change would be made and the proposed Sampling Schedule would be resubmitted to HRMB. As of this date the corrected submittal has not been received. HRMB assumes that following receipt of this letter NRC will send the corrected version of the proposed Sampling Schedule to our office.

If you have any questions please contact Steve Alexander at 827-4300.


Edward Horst, Program Manager
Hazardous and Radioactive Materials Bureau

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Approved

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SAMPLING SCHEDULE

In compliance with Module III, Section M, Paragraph 1.0 of Giant's Hazardous Waste Permit (NMD000333211-2) and in response to previous indications of possible migration of constituents beneath the treatment zone, Giant is conducting a comprehensive sampling schedule as follows:

<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	GRC submits to the New Mexico Environment Department, New Mexico Coordinate System survey data which includes the following information: 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.

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.

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, including Acetone and excluding dioxins and furans. The following Appendix IX total metals will be analyzed: Cadmium, Chromium, and Lead.

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", and/or the New Mexico Environment Department document "Components of an Adequate Laboratory Quality Assurance/Quality Control Plan".

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.

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.

