



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

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

August 18, 1993

John Stokes, Refinery Manager
Giant Refining Co.
Route 3, Box 7
Gallup, New Mexico 87301

**RE: Operating Permit Modification
NMD000333211**

Dear Mr. Stokes:

The Hazardous and Radioactive Materials Bureau (HRMB) received an application for a Permit modification for Giant Refining Co. (GRC), which was submitted in response to the Bureau's January 25, 1993, letter. The application includes proposed changes in the land treatment unit's operating procedures and a sampling and analysis program to further characterize contaminants identified beneath the treatment zone.

Although the HRMB requested that the sampling and analysis program mentioned above be made a part of the application, we conclude that it is appropriate for GRC to complete the characterization of contaminants beneath the treatment zone before suitable modifications to the Permit may be developed for changes that may be needed in the operating procedures. Thus the HRMB requires that GRC complete the contaminant characterization before submitting a final Permit modification application. GRC must propose the modifications needed in the permit based on the final results obtained from the characterization.

The final application for a Permit modification is due to the HRMB by November 1, 1993, and should be sent to the attention of Barbara Hoditschek, RCRA Permit Program Manager. This modification application is to propose changes needed in the operating procedures to ensure degradation, immobilization, and fixation within the treatment zone to prevent contamination from being released beneath the zone. The HRMB expects that this extension of time will allow GRC to complete all characterization activities and to develop appropriate changes proposed for the Permit. The Permit modification application must include specific language changes requested in the Permit conditions, and supply technical data to support operational changes requested. Changes to the Permit must be submitted on a 3.5 high density/double sided disc on wordperfect 5.1. New language proposed for the Permit and the original language should be highlighted or otherwise identified.

August 18, 1993
Stokes
Page 2

If the results of the contamination investigation demonstrate that the contamination beneath the treatment zone can not be corrected through a Permit modification, then the HRMB will consider a proposal to terminate the operating Permit and initiate closure of the unit. It is important that the investigation clearly indicate whether or not continued operation of the unit is possible.

GRC may request that the Technical Program staff of the HRMB assist in informal technical review of the sampling and characterization program to obtain an indication of the type of technical data needed to fully evaluate the contaminants beneath the treatment zone. Our Technical Program staff may be able to provide recommendations on the sampling data needed to assist GRC on the elements of a Permit modification application.

The HRMB is also scheduling the GRC permit five (5) year review for November 1993, as described in the GRC Permit Condition, Module I.A. It is important that we receive the modification application requested in this letter no later than November 1, 1993, so that this information may be considered in the five year Permit review process. The five year review is to determine whether cause exists to modify, or to revoke and reissue, or to terminate the operating Permit. The HRMB may request an updated Permit application from GRC based on the results of our November 1993, review.

If your environmental staff has any technical questions, please have them contact Jane Cramer at (505) 827-4313. For questions relating to Permit modification procedures, please contact me or Marc Sides at (505) 827-4308.

Sincerely,



Barbara Hoditschek, RCRA Permit Program Manager
Hazardous and Radioactive Materials Bureau

cc: Marc Sides, HRMB
Jane Cramer, HRMB
Steve Alexander, HRMB
David Neleigh, EPA (6H-PN)

GOCC93 Steve



Jane's
copy

Route 3, Box 7
Gallup, New Mexico
87301

505
722-3833



June 11, 1993

Roger Anderson
Environmental Bureau Chief
State of New Mexico Oil Conservation Division
P.O. Box 2088
Land Office Building
Santa Fe, NM 87504-2088

RE: Notification of Contaminants in Groundwater Analysis
from Monitoring Well, OW-1

Dear Mr. Anderson:

This is to notify the Oil Conservation Division of a potential groundwater problem at Giant's Ciniza Refinery. Giant has enclosed copies of the initial semiannual sampling data for OW-1 and the confirmation sampling data. The initial and confirmation data indicate concentrations of BTEX in groundwater from OW-1, located on the western edge of the refinery property. The concentrations do not exceed WQCC standards.

Giant will resample OW-1 on July 11, 1993. If the contaminants are still present, Giant will within 30 days of making that determination, submit a plan to determine the source of such.

Should you have any questions, please contact me at 1-722-3833.

Respectfully yours,

Zeke Sherman
Environmental Manager
Giant Industries Arizona, Inc.

ZRS:smb

cc/w: J. Stokes, Giant Refining Company
K. Bullerdick, Giant Industries Arizona Inc.
L. Shelton, Giant Refining Company
E. Horst, NMED
B. Driscoll, Region VI, EPA



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX, MTBE (EPA 8020)
CLIENT : GIANT REFINING
PROJECT # : (NONE) ATI I.D.: 304451
PROJECT NAME: ANNUAL GROUNDWATER

SAMPLE I.D. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
06	OW-1	AQUEOUS	04/28/93	NA	05/03/93	1
07	OW-2	AQUEOUS	04/28/93	NA	05/03/93	1
08	OW-3	AQUEOUS	04/28/93	NA	05/03/93	1

PARAMETER	UNITS	06	07	08
BENZENE	UG/L	<0.5	<0.5	<0.5
TOLUENE	UG/L	2.3	<0.5	<0.5
ETHYLBENZENE	UG/L	<0.5	<0.5	<0.5
TOTAL XYLENES	UG/L	<0.5	<0.5	<0.5
METHYL-t-BUTYL ETHER	UG/L	<2.5	<2.5	<2.5
BROMOFLUOROBENZENE (%)		95	91	92

