



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

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1994

**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

Mr. John J. Stokes, Manager  
Giant Refining Company  
Route 3, Box 7  
Gallup, New Mexico 87301

XIII

RE: RCRA Facility Investigation (RFI) Phase III Report and  
Voluntary Corrective Action Plan  
Giant Refining Co.  
NMD000333211

Dear Mr. Stokes:

The Environmental Protection Agency (EPA) hereby approves your RCRA Facility Investigation Phase III Report dated November 3, 1992, with the enclosed modifications. The EPA is requiring that additional soil sampling be completed at several sites, including the Landfill Areas, the Old Burn Pit, the Secondary Skimmer, and the Fire Training Area. A supplementary report detailing the results of these sampling activities shall be submitted to the EPA by December 31, 1994.

Additionally, the EPA is approving the voluntary Corrective Action Plan for the Landfill Areas, submitted in March, 1993.

If you have any further questions or need additional information, please contact Nancy Morlock at (214) 655-6650 or Richard Mayer at (214) 655-7442.

Sincerely yours,

Allyn M. Davis, Director  
Hazardous Waste Management Division (6H)

Enclosure

cc: Kathleen Sisneros, NMED ✓

**APPROVAL WITH MODIFICATIONS  
GIANT REFINING COMPANY  
RCRA FACILITY INVESTIGATION PHASE III REPORT  
AND THE  
CORRECTIVE ACTION PLAN FOR THE LANDFILL AREAS**

The Environmental Protection Agency (EPA) has completed a technical review of your RCRA Facility Investigation (RFI) Phase III Report, dated October, 1992, and your voluntary Corrective Action Plan for the Landfill Area, dated February, 1993. The subject reports are hereby approved with the following comments and modifications.

**GENERAL COMMENTS**

✓  
**SWMU 5, The Empty Container Storage Area**

The EPA hereby approves the finding of No Further Action (NFA) for Solid Waste Management Unit (SWMU) number three (3), the Empty Container Storage Area. However, this approval is contingent upon the completion of a survey plat for the unit. The survey plat shall be completed in accordance with the procedures outlined in 40 CFR 264.116. Giant shall submit a copy of the survey plat to the EPA for review and approval. Upon approval, Giant may submit a Class III permit modification to terminate the RFI/Corrective Measures Study (CMS) process for the Empty Container Storage Area.

✓  
**SWMU 8, The Old Burn Pit**

Due to the presence of elevated levels of volatile and semivolatile contaminants in soil samples from this unit, the EPA is unable to approve Giant's finding of No Further Action. All three (3) soil samples taken at the 4.5 foot interval (the deepest interval sampled) contained elevated levels of heavy molecular weight semivolatiles. Additionally, one of the three (3) samples at the 4.5 foot interval also contained elevated BTEX levels. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications).

✓  
**SWMU 11, The Secondary Oil Skimmer**

Due to the presence of elevated levels of volatile and semivolatile contaminants in soil samples from this unit, the EPA is unable to approve Giant's finding of No Further Action. One of the two (2) samples taken at the 3.0 foot interval (the deepest interval sampled) contained volatile and semivolatile contaminants. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications).

✓  
**SWMU 4, The Fire Training Area**

Due to the presence of elevated levels of oil and grease in soil samples from this unit, the EPA is unable to approve Giant's finding of No Further Action. Two (2) of the four (4) samples

taken at the 4.5 foot interval (the deepest interval sampled) contained oil and grease above 2,000 ppm. The EPA is therefore requiring deeper sampling at specified points (see below under Modifications).

**SWMU 7, The Landfill Areas**

Because soil borings completed in this unit indicate the presence of waste and metal contamination at depths up to 9.5 feet, the EPA is requiring that additional soil borings be completed at greater depths. These additional soil borings will be installed in order to:

- 1) Verify that saturated zones found in three (3) of the 12 deepest soil boring intervals are isolated and are not connected to the groundwater;
- 2) Ensure that the vertical extent of waste emplacement has been defined;
- 3) Confirm that the vertical extent of metal contamination has been delineated.

Following the completion of the additional soil borings in the Landfill Areas, Giant may proceed with the capping of the landfills as per their voluntary Corrective Action Plan.

**MODIFICATIONS**

Note: All referenced sampling points correspond to the previous RFI sampling points completed in May, 1992. Soil boring logs included in future report submittals shall follow the attached example.

**SWMU #8, The Old Burn Pit**

Giant shall complete soil borings as close as possible to sample points one (1), two (2) and three (3). Sampling intervals shall be at six (6) and (10) feet and must extend vertically until no subsequent increase in contaminant levels is likely to occur. A minimum of two (2) "clean" samples are required to verify delineation. Sampling procedures and analytical requirements are identical to those required in the previous RFI. The results of this sampling event shall be submitted to the EPA by December 31, 1994.

**SWMU #11, The Secondary Oil Skimmer**

Giant shall complete two (2) soil borings within the area occupied by the former Skimmer. All borings must be sampled at the 5-6 foot and 9-10 foot interval. Sampling shall extend vertically until no subsequent increase in contaminant levels is likely to occur. A minimum of two (2) "clean" samples are required to delineate contamination. Sampling procedures and analytical requirements are identical to those required in the previous RFI. The results of this sampling event shall be due to EPA by December 31, 1994.

Approval with Modifications, 1/5/94  
Giant's RFI Phase III & CAP Reports

**SWMU #4, The Fire Training Area**

Giant shall complete angled soil borings as close as possible to sample points one (1) and two (2). Sampling intervals shall be at 7 and 11 feet. Sampling must extend vertically until no subsequent increase in contaminant levels is likely to occur. A minimum of two (2) "clean" samples are required to delineate contamination. Sampling procedures shall be identical to those required in the previous RFI. Analytical constituents shall include the Skinner constituents. The results of this sampling event shall be submitted to the EPA by December 31, 1994.

**SWMU #7, The Landfill Areas**

Giant shall take soil borings as close as possible to sample points two (2) through seven (7), and nine (9). Sampling intervals shall be at 11 feet, 16 feet and 20 feet. Sampling must extend vertically until no subsequent increase in contaminant levels is likely to occur. A minimum of two (2) "clean" samples are required to delineate contamination. Sampling procedures shall be identical to those required in the previous RFI. Giant shall analyze all samples for metals. If volatile or semivolatile contamination is encountered when sampling, then those constituents shall be analyzed also. The results of this sampling event shall be due to EPA by December 31, 1994.

# BORING LOG

PROJECT: 622092005-254 (TBL-A1)  
 CLIENT:  
 BORING NUMBER: TBL-A1  
 EXCAVATED POND: N/A  
 FIRST ENCOUNTERED WATER: N/A  
 DATE COMPLETED: 01/28/93

SHEET: 1 of 1  
 DRILLED BY: Precision Eng.  
 LOGGED BY: PWC  
 SURF. ELEV: N/A  
 TOTAL DEPTH: 6.0'

DESCRIPTION	DEPTH (ft.)	SYMBOL	SAMPLE	WELL DESIGN
0-3.0' SANDY CLAY mixed with OILY SLUDGE, stained black by hydrocarbon products, moist, sticky, strong hydrocarbon odor decreasing slightly with depth. PID 25 ppm.	1	[Hatched Box]	[X]	
	2	[Hatched Box]	[X]	
3.0-5.0' SANDY CLAY, brown, dry, crumbly, slight hydrocarbon odor decreasing with depth. No visual contamination, PID 35 ppm.	3	[Hatched Box]		
	4	[Hatched Box]		
5.0-6.0' CLAYEY SAND, tan to white, dry, crumbly, faint hydrocarbon odor. No visual contamination, PID 2.0 ppm.	5	[Hatched Box]	[X]	
	6	[Hatched Box]	[X]	
TD = 6.0'  NOTE: Drill crew excavated the first foot by shovel, then pressed a 5.0' split recovery barrel from 1.0-6.0'.  Bentonite pellets were placed in the boring to within a foot of the surface and hydrated.				

